DOCUMENT RESUME

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ABSTRACT

Volume 3 of the 3-volume report by ACKCO, Inc. presents various appendixes pertaining to the legislative review and the fiscal, management, and program studies conducted by ACKCO, Inc. to review the Impact-Aid Program, Johnson-O'Malley Program, Indian Education Act, and the Elementary and Secondary Education Act Title I. A chronological summary of the principal Federal legislation affecting education from 1777 to 1974 is given. Findings for each of the various sites visited are discussed. The appendixes include: (1) charts of rating summaries by funding source within organizational level; (2) diagrams illustrating the flow of funds to the various sites which were visited; (3) recommendations and/or comments offered by some of the personnel who were interviewed during the field visits; (4) management profile of the sampled State Education Agency Planning Units; (5) fiscal compliance ratings based on generally accepted auditing procedures and on the rules and regulations of the laws being considered; (6) charts of revenue by source and site, schedule of Federally-sponsored programs, and expenditures by function and site; (7) scale content for program questionnaires, sample descriptions, and an analysis of program data at a single site; and (8) a review of the Bureau of Indian Affairs. Listings of abbreviations used, legal cases, and a selected bibliography are also given. (NQ)

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"SO THAT ALL INDIAN CHILDREN WILL HAVE EQUAL EDUCATIONAL OPPORTUNITY"

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APR 28 1975
E.R.I.C.

USOE/BIA STUDY OF THE IMPACT OF FEDERAL FUNDS ON LOCAL EDUCATION AGENCIES ENROLLING INDIAN CHILDREN

Prepared for:

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WASHINGTON, D.C.

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RC008528

VOLUME 3

EXPLANATORY NOTE TO VOLUME III

As was mentioned in the explanatory note to Volume II, because of its size the report has been printed in three volumes for easy handling. It is important to note, however, that it should be considered as a unified whole. Volume I includes a Summary of the report, the Introduction, a section on Issues in Education and a section on Indian Education: Past, Present and Future. Volume II contains the different study area reports including the Legislative, Management, Fiscal, Program and Elements of Program Success studies. We must mention that the above studies make their recommendations in the light of their particular viewpoints and that it is necessary to look at the Summary in Volume I to find conclusions and recommendations based on an overall view of empirical and non-empirical findings.

This volume (Volume III) contains the appendices to the study including backup materials to the legislative, management, fiscal and program studies. It also includes a review of the Bureau of Indian Affairs in the light of the new Johnson-O'Malley Regulations and a review of the physical facilities problems of LEA's enrolling Indian children. Finally, there is a List of Abbreviations and a Selected Bibliography.

ERRATA

Volume III

App. I-A

e	Line	Is	Should be
Expl. note	20	children	children.
App. I-1	3	moveAffectingEduca-tionup	2 spaces
App. I-1	4	relates	relate
App. I-1	12	schooling	schooling in
App. I-1	footnote 1	Ken	Kern
App. I-2	5	expenditures	expenditure
App. I-3	18	Act-matching	Act - matching
App. I-6	2	state of	state or
App. I-6	3	corporation"	corporations"
App. I-7	21	Hope	Hopi
App. I-10	12	school	schools
App. I-11	13	Act to	Act - to
App. I-12	8	program	programs
App. I-13	1	diecretionary	discretionary

II-A --------

App. II B - App. II-14 missing LEA 2

App. II-C --------

App. II-D

App. II-25	4/5	anal-/yses	anal-/ysis
App. II-29	5	Title IV	SEA 2
App. II-30	23	suggest since	suggest, since
App. II-34	18,21	Indian tribes or or-ganizations	LEAs
App. II-34	23	disseminiation	dissemination
App. II-35	12	areas or	areas of
App. II-37	14	and were	and was
App. II-40	12	of the program	of program
App. II-40	13	although	, although
App. II-41	1	nonexistent	nonexistent,
App. II-45	15	that since	that, since
App. II-46	18	training where	training, where

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App. II-D

e	Line	Is	Should be
App. II-49	4	training where	training, where
App. II-49	5	nonexistent and	nonexistent, and
App. II-49	6	organizationally where	organization, where

*Notes - in Appendix II-D, there are two repeated mistakes.

A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,

B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

App. II-E

App. II-53	2	Unit	Units

App. III-A

App. III-3	9	aids	aides
App. III-3	29	publications	publication
App. III-3	30	were	was
App. III-4	18	recieve	receive
App. III-5	14	The Addendum	Should be all capitals and set on its own line like P. L. 874 or Title I
App. III-6	11	behaviors which	behaviors, which
App. III-7	5	preventative	preventive
App. III-7	26	job; if	job, if
App. III-7	28	used; and	used and
App. III-8	1	effective, the	effective. The
App. III-8	16	input	output
App. III-9	4	unit	units
App. III-10	9	from low-	from Low-
App. III-11	1	formulates	formulas
App. III-11	20	combine	combined
App. III-12	22	population" would	population," would
App. III-13	23	school	schools
App. III-14	10	that at	that, at
App. III-16	5/6	Pro-/	Pro-/grams
App. II-18	3	students, all	students. All
App. III-18	5	extra curricular	extra-curricular
App. III-20	28	The P. L. 874	omit The

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App. III-A

e	Line	Is	Should be
App. III-25	22	signi-	signif-
App. III-31	22	budget, to	budget to
App. III-34	11	finalizing	penalizing
App. III-35	4	were directed	was directed
App. III-35	23	statements, as	statements as
App. III-36	6	no	not
App. III-37	26	Once	Hence,
App. III-39	8	year's	years'
App. III-46	20	home school	home-school
App. III-47	6	Title IV was	Title IV money was
App. III-47	13	(at LEA 9... elementary)	(at LEA 9)... elementary
App. III-51	13	2036.28	2036.28
App. III-51	19/20	or out/of compliance	delete or out of compliance
App. III-52	5/6	No. of Partic.	No. of Partic.
App. III-60	10	circumstances".	circumstances."
III-61	10	Other problems were	Another problem was
III-61	12	this	these
App. III-62	4	from	of
App. III-62	25	ings	ing
App. III-63	1	methods".	methods."
App. III-63	4	materials and	materials, and
App. III-63	25	funding	funded
App. III-64	14	organizations	organization's
App. III-64	16	Million	million
App. III-65	19	costs	cost
App. III-68	3 and 13	mentioned that Title IV was included in "Consolap" process, then said it wasn't	
App. III-69	25	I rules	IV rules
App. III-70	6	Personal costs	Personnel costs
App. III-70	16/17	ser-/vices	serv-/ices
App. III-70	23	from the Title I	from Title I

App. III-B

III-75	19	reg.	regulations
App. III-77	12	administrators	administrator's

e	Line	Is	Should be
pp. III-B			
pp. III-77	13	above mentioned	above-mentioned
pp. III-77	14	Tile I	Title I
pp. III-78	3	Chart I	Chart 1
pp. III-C	79 to 84	the left side of the Charts need to be redone since they are illegible	
pp. IV-A			
pp. IV-1	1	Question	Questionnaires
pp. IV-1	2	EDCQ Scales	Educational Content Questionnaire
pp. IV-3	1	PACQ Scales	Parent Advisory Committee"
pp. IV-5	1	BCQ Scales	Business Community"
pp. IV-B			
pp. IV-6,7		Role-Group numbers should be explained	
IV-C			
pp. IV-8	6	state C	State C
pp. IV-8	18	site 5	Site 5
pp. IV-10	13	gram, program	gram; program
pp. IV-10	14	program, and	program; and
pp. IV-10	22	tions, are	tions are
pp. IV-13 to 16		there should be a note on where to find the explanations for the abbreviations or a repetition of the explanations	
pp. IV-14	bottom	mush	much
pp. IV-D			
pp. IV-17	5	sites useful	sites and to be useful
pp. IV-19	12	nonetheless	,nonetheless,
pp. IV-19	20	paralleled the	paralleled a
pp. IV-20	24	children and	children, and
pp. IV-21	23	Minnesota;	Minnesota
pp. IV-24	3	writers and	writers, and
pp. IV-25	26	materials yet	materials, yet
pp. IV-29	17	and thus preferable	and, thus, perferable

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Page	Line	Is	Should be
App. IV-D			
App. IV-33	2	rural area	rural areas
App. IV-33	19	attend some one	attend one
App. IV-34	13	school informed	school official informed
App. IV-35	17	program, with	program with
App. IV-35	24	3.	4.
App. IV-E			
App. IV-50	40	Indain	Indian
App. IV-53	12	classroom changes	classroom. Changes
App. IV-53	23	programs	program
App. V			
App. V-1	18	programs:	programs;
App. V-2	11	Indian owned	Indian-owned
App. V-4	8	effort and	effort, and
App. V-6	31	assistance	Assistance
App. V-8	12	Education	Educational
App. V-8	25	education has	education, has
App. V-9	1	Additionally a	Additionally, a
App. V-9	5	finding	findings
App. V-9	12	focussed	focused
App. V-9	13	structure but	structure, but
App. V-9	18	administrations	administration
App. V-10	19	that is gives	that it gives
App. V-11	2/3	struc-/ture BIA	struc-/ture of BIA
App. V-11	12	the BIAs	the BIA
App. V-11	15	however the	however, the
App. V-12	7	area	Area
App. V-12	24	area office	Area Office
App. V-14	14	and if	and, if
App. V-15	17/18	bud-/geting	budg-/eting
App. V-16	22	BIAs budget formulating	BIA's budget-formulating
App. V-17	16	not be ready nor want to	not be ready to, nor want to,
App. V-17	18	Additionally the	Additionally, the
App. V-18	3	include	includes

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Page	Line	Is	Should be
App. V			
App. V-18	8	Additionally	Additionally,
App. VI			
App. VI-2	15	facilities, and	facilities; and
App. VI-2	17	instruction".	instruction."
App. VI-6	7	funded".	funded."
App. VI-6	10	authorization and	authorization, and
App. VI-6	21	employed we	employed, we
Bibliography			
B-1	3,6,10,19,25	remove commas after author or editor	
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B-3	16	Mron	Myron
B-3	18	something missing - city	
B-4	8	(Memeographed)	(Mimeographed)
B-4	11,24,32	should be period between author and title	
B-10	13	Subcommitte	Subcommittee
B-13	14	Natonabak	Natonabah

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APPENDIX I

A. SUMMARY OF FEDERAL LEGISLATION

AFFECTING EDUCATION

(Asterisks specifically relate to Indian Education)

Summary of Federal Legislation Affecting Education - 1777 to 1974.[1]

Following is a chronological summary of the principal federal legislation effecting education from 1777 to 1974:

1777:

Initiation of direct administration of education programs - the instruction of military personnel, including schooling in mathematics.

1785:

Commencement of aid to territories for education by endowment of schools with public lands.

1878:

Commencement of endowment of public institutions of higher education with public lands - Northwest Ordinance: "Schools and the means of education shall forever be encouraged."

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[1]Roe L. Johns, Kern Alexander and Forbis K. Jordan, Financing Education: Fiscal and Legal Alternatives, (Columbus Ohio: Charles E. Merrell Publishing Co., 1972), pp. 386-388. This appendix is an adaptation of a summary on federal legislation which appears in Chapter 10.

1802:

Establishment of the first federal institution of higher education - Military Academy at West Point.

*1802:

An Act authorizing the expenditure of a sum "not to exceed $15,000 per annum to promote civilization among the aborigines."

1804:

District of Columbia - federal provision for education begins.

*1819:

An Act establishing the sum of $19,000 to prevert "further decline and final extinction of the Indian tribes" by introducing among them "habits and arts of civilization."

1862:

The First Morrill Act - initiated federal policy of aid to states for agricultural and industrial education through land grants for colleges.

1867:

Federal Department of Education established by Congress; later the Office of Education.

*1870:

An Act by which $1,000,000 was set aside for the education of Indian people.

1874:

Introduction of the principle of federal-state

matching of funds for education.

**1882:

Act providing that abandoned military posts might be turned over to the Department of Interior for conducting therein Indian schools.

1887:

Hatch Act - encouraged scientific investigation in agriculture.

1890:

The Second Morrill Act - introduction of federal grants of money for college instruction in specified areas of learning.

**1897:

Appropriation for Indian Services - this act provided for an appropriation for the education of Indian children in sectarian schools.

1914:

Smith-Lever Act - matching of funds for agricultural and home economics instructions.

1917:

The Smith-Hughes Act - began policy of promoting vocational education below college level through assistance with teachers' salaries.

1918:

Rehabilitation training for disabled veterans.

**1918:

Legislative Act - settled the policy that federal

government would make an appropriation for education of Indian children in sectarian schools.

1919:

Federal surplus property available to educational institutions.

1920:

The National Defense Act of 1920 - direct relationship between the federal government and education institutions.

1920:

Smith-Bankhead Act - federal-state cooperation in vocational rehabilitation; education for people disabled in industry.

**1921:

Snyder Act of 1921 - authorizes the Bureau of Indian Affairs to direct and supervise and expand such funds appropriated by Congress for land management, welfare and education of Indian Tribes.

**1924:

Indian Citizenship Act - entitled Indians to the same rights as non-Indians including state education.

1933:

Federal Emergency Relief Administration - supported educational programs.

1933:

Civilian Conservation Corps - provided vocational

education.

**1934:

Indian Reorganization Act - provided support for Indian vocational programs and Indian higher education.

**1934:

Johnson-O'Malley Act - enacted to provide federal assistance to states to support activities related to health, education and welfare (including relief of distress) of Indian people.

1935:

National Youth Administration - employment for college students.

1935:

Bankhead-Jones Act - increased support for land grant colleges.

1936:

Promotion of Inter-American Cultural Relations Convention - international educational exchanges.

1936:

George-Deen Act - extended the Smith-Hughes Act.

1937:

National Cancer Institute Act - provided fellowship grants.

**1936:

Amendments to the Johnson-O'Malley Act to permit contracting with "States (or political sub-

divisions), Territories or State universities, colleges or schools or appropriate state or private corporations" for activities related to the health, education or welfare of Indian people.

1941:

Lanham Act - provided educational assistance for schools in communities affected by the federal government's activities.

1943:

Vocational Rehabilitation Act - aid for disabled veterans.

1944:

The Servicemen's Readjustment Act - G. I. Bill, educational aid for veterans.

1944:

Surplus Property Act - government surplus given to educational institutions.

1946:

National School Lunch - gave funds and food to public and non-public schools; school milk program added in 1954.

1946:

George-Barden Act - extended Smith-Hughes Act by increasing appropriation.

1948:

Smith-Mundt Act - program of international

educational exchanges.

1949:

Federal Property and Administrative Services Act - surplus property disposal for educational, health and civil defense purposes.

1950:

The National Science Foundation Act - promoted progress in science through scholarships and fellowships in fields of science.

1950:

The Housing Act - low interest rates for loans to institutions of higher learning for building of housing facilities.

1950:

Federal Impact Laws (P. L. 815 and P. L. 874) - extended the Lanham Act of 1941; provided assistance to communities affected by activities of the federal government for construction and operation of schools.

**1950:

Navajo-Hopi Rehabilitation Act - allowed funds for school construction, "bordertown" dormitories to permit Navajo and Hopi children to attend public schools.

**1953:

Amendment to the Federal Impact Laws (P. L. 815 and P. L. 874) entitled schools to receive funds due to the presence of non-taxable Indian lands

that caused financial hardships to the school district.

**1953:

Transfer of Federal Property Act - authorizes the Secretary of the Interior to transfer federal property to states or local educational agencies to assure educational activities of Indian students.

1954:

Cooperative Research Act - authorized the Office of Education to conduct cooperative research with colleges, universities and state educational agencies.

1956:

Indian Adult Vocational Act - authorizes BIA to provide programs that would assist Indians obtain "reasonable" and "satisfactory" employment. This became known as the "relocation program."

1958:

United States and Union of Soviet Socialist Republics agree to exchange study groups in educational and cultural fields.

1958:

The National Defense Education Act - provided for graduate fellowships in science, mathamatics, foreign languages, counseling and guidance, educational technology.

1958:

Fogarty-McGovern Act - federal grants to train teachers of mentally retarded children.

1961:

Area Redevelopment Act - training of persons in redevelopment areas.

1961:

Peace Corps Act - supplied teachers and technicians to underdeveloped nations.

1961:

Juvenile Delinquency and Youth Offenses Control - study of problem.

1962:

Manpower Development and Training Act - up-to-date training for the unemployable.

1963:

Health Professions Educational Assistance Act - construction of facilities and student loans.

1963:

Mental Retardation Facilities and Community Mental Health Centers Construction Act - training of teachers and demonstration centers.

1963:

Higher Education Facilities Act of 1963 - grants to all colleges, public and private, for improvement of facilities.

1963:

Amendments to the Manpower Development and Training Act - expansion of provisions of law, 1962.

1963:

Vocational Education Act of 1963 - construction of vocational schools with expanded offerings; extended Impact Laws (1950) and NDEA (1958).

1964:

The Civil Rights Act of 1964 - desegregation of the schools enforced and assisted.

1964:

Juvenile Delinquency and Youth Offenses Control Act Amendment - new programs and special studies.

1964:

Economic Opportunity Act of 1964 - war on poverty through retraining and remedial education and other opportunities.

1964:

Amendments to National Defense Education Act - extended and expanded to include areas of English, reading, history and geography.

1965:

Elementary and Secondary Education Act - federal grants to states for allocation to school districts with low income families.

1965:

National Foundation for the Arts and Humanities - foundation to support humanities and the arts through grants.

1965:

Higher Education Act of 1965 - aid to colleges, students and teachers.

1966:

International Education Act - to provide a strengthening of American educational resources for international studies and research.

1967:

Education Professions Development Act - to coordinate, broaden and strengthen programs for the training and the improvement of educational personnel.

1968:

Vocational Educational Amendment of 1968 - redirect, reorganize and expand vocational education.

1968:

Higher Education Amendments of 1968 - extended and improved four major education acts and authorized six new programs.

1968:

Handicapped Children's Assistance Act - federal effort to help handicapped children at pre-school

level.

1971:

Handicapped Education Act - provides grants for improved educational opportunities for handicapped children.

**1971:

Bilingual Education Act - provides grants for imaginative programs to meet the needs of children who come from environments in which English is not the primary language.

**1972:

Indian Education Act - Part A provides funds to public schools to meet the special educational needs of Indian children, provides for planning and implementing innovative programs, training and other programs generally related to the Indian community. Includes a 5 percent set aside in Part A for non-LEAs.

Part B of Title IV authorizes discretionary funds for planning, implementing and evaluating special innovative projects designed to enhance the educational attainment of Indian children. Funds authorized under this section may go to schools, Tribes, Tribal organizations and institutions for improving educational opportunities of Indian children.

Part C of Title IV authorizes discretionary funds for planning, implementing and evaluating special planning and demonstration programs to stimulate the basic literacy opportunities for Indian adults and to disseminate the results of the effectiveness in achieving its purpose.

**1974:

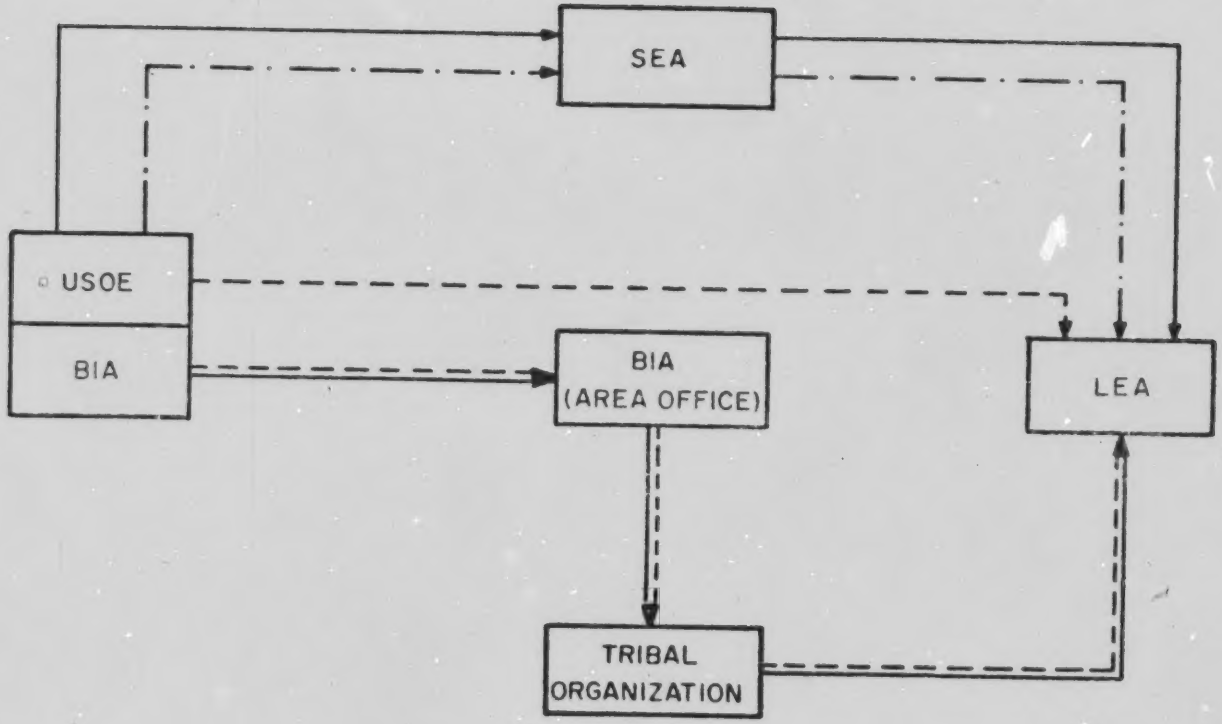
Education Amendments Act - generally amends P. L. 874, P. L. 815 and the Elementary and Secondary Education Act; specific amended provisions which relate to Indians include an allotment to the Secretary of the Interior for payments to local education agencies for out of state Indian children in the elementary and secondary schools of such agencies under special contracts with the Department of the Interior. Specific amendments to the Indian Education Act include: an increase from 5 percent to 10 percent for new LEAs (less than three years old) and non-LEAs; assistance to private schools educating Indian children; a training program for teachers of Indian children; and a fellowship program (which shall not exceed 200) for Indians in non-educational related fields.

APPENDIX II.-A: FUNDS FLOW

This appendix contains diagrams illustrating the flow of funds to the various sites that were visited. Once again, because no purpose would be served by identifying the locations, state names have been deleted and code letters substituted.

FUNDS FLOW DIAGRAM

State : A



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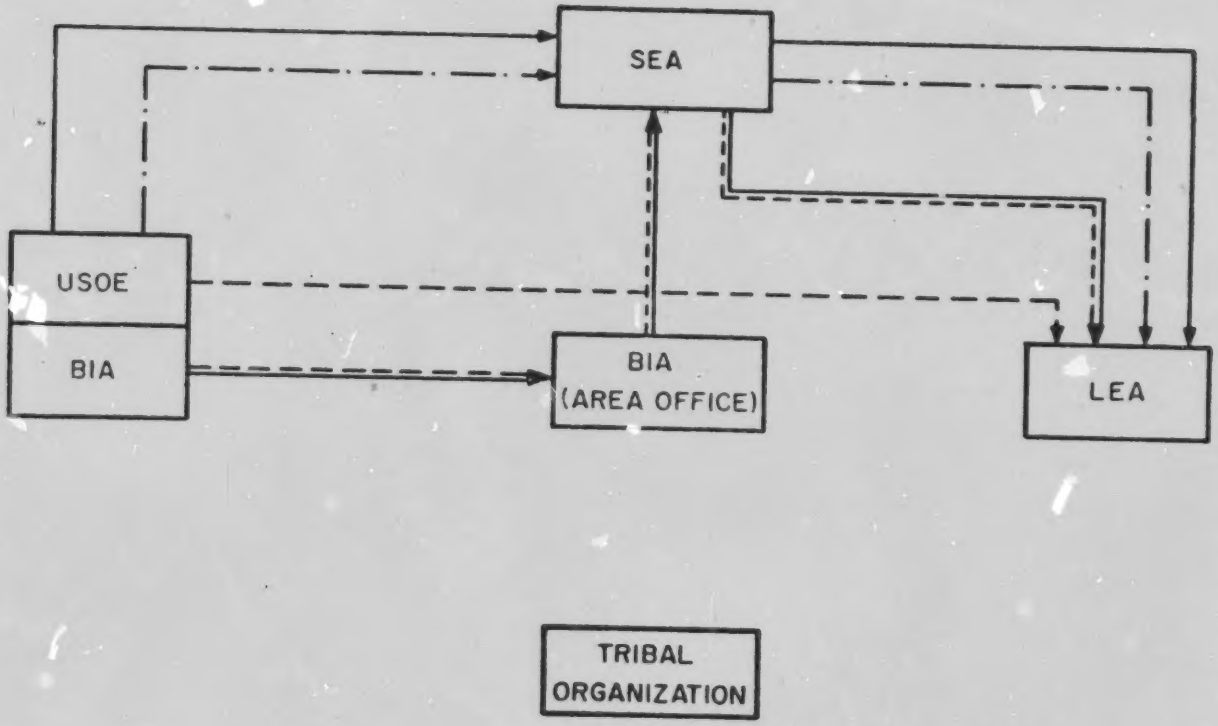
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(AREA OFFICE)
LEA
TRIBAL
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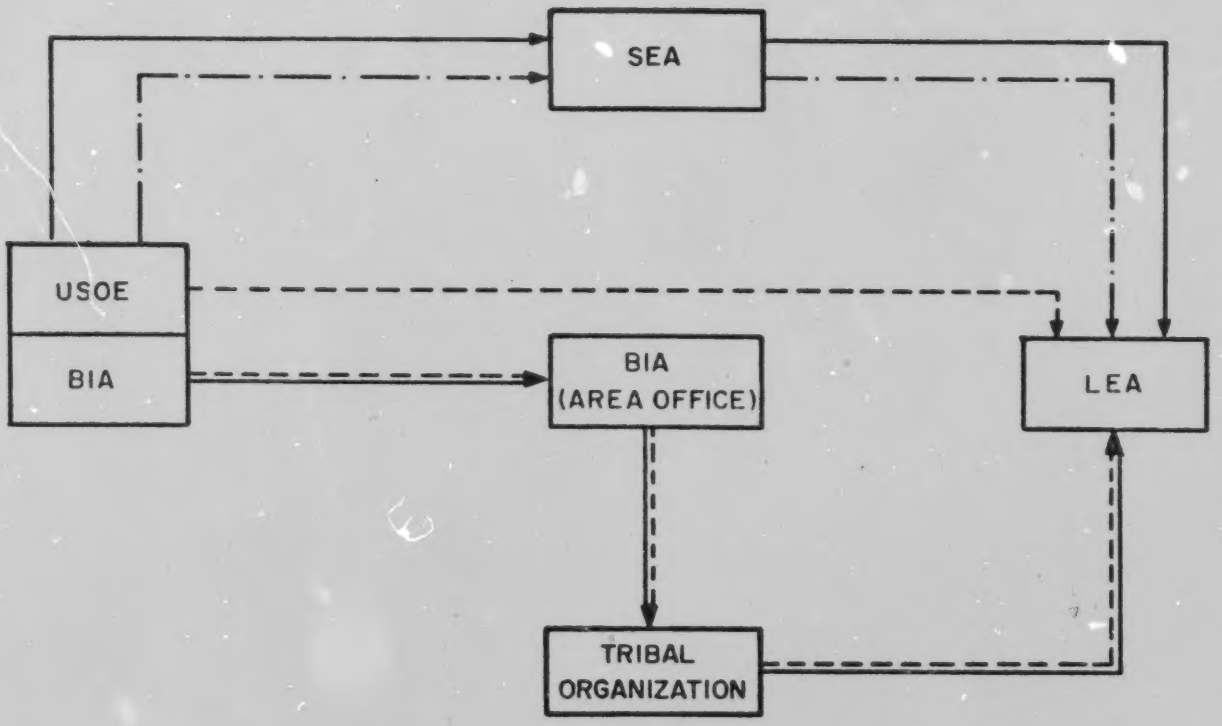
TITLE I
TITLE IV
PL-874
JOHNSON O'MALLEY

FUNDS FLOW DIAGRAM

State: C



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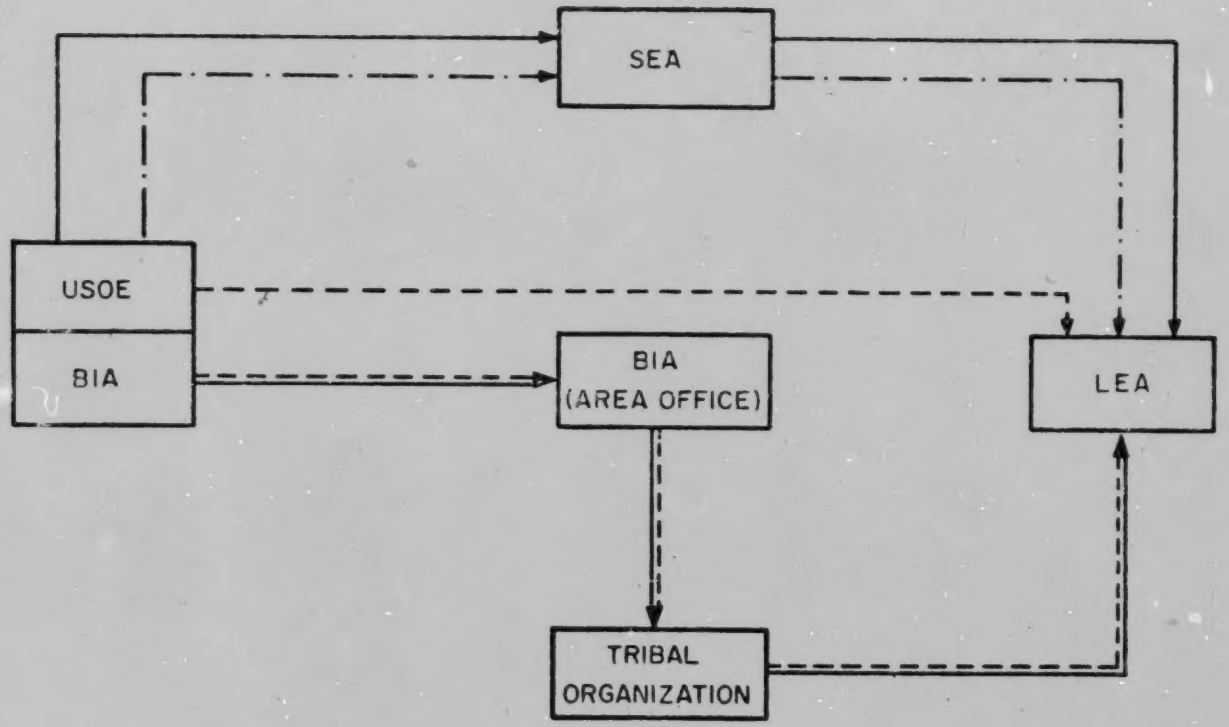
FUNDS FLOW DIAGRAM

State: D



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FUNDS FLOW DIAGRAM

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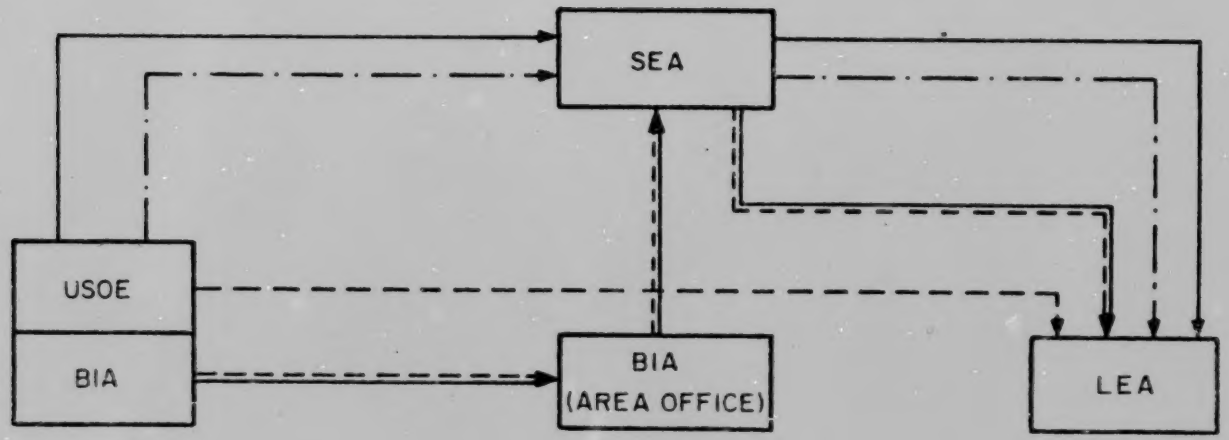

TRIBAL ORGANIZATION

LEGEND:

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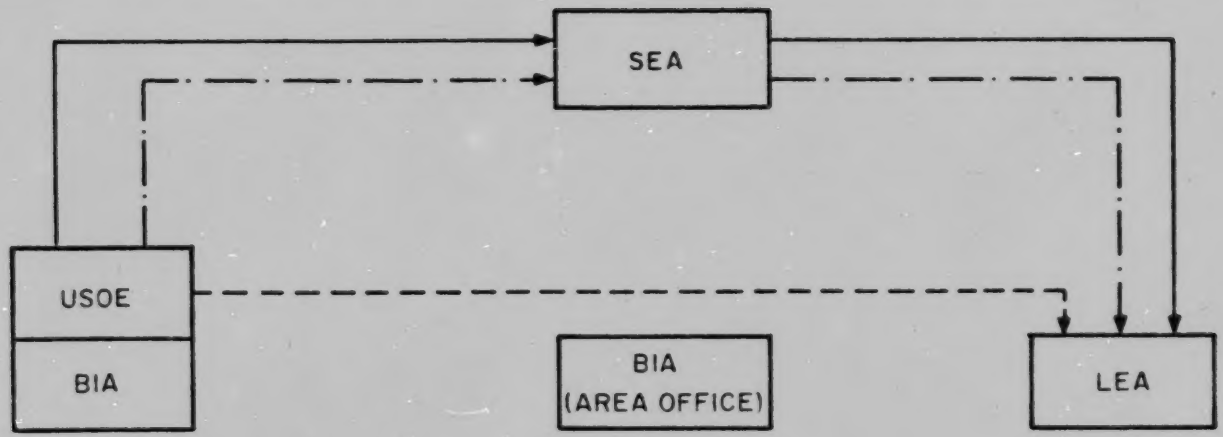
JOHNSON O'MALLEY

0030

FUNDS FLOW DIAGRAM

State: F



TRIBAL
ORGANIZATION

LEGEND:

TITLE I

TITLE IV

PL-874

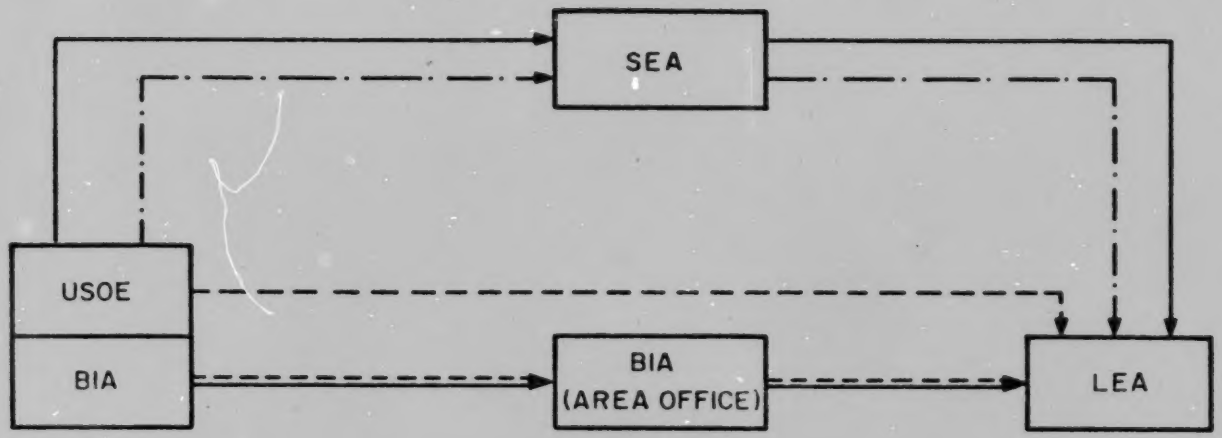
JOHNSON O'MALLEY

* NOT APPLICABLE TO THIS SITE

0031

FUNDS FLOW DIAGRAM

State: G



TRIBAL ORGANIZATION

LEGEND:

TITLE I

TITLE IV

PL-874

JOHNSON O'MALLEY

2800 0082

FUNDS FLOW DIAGRAM

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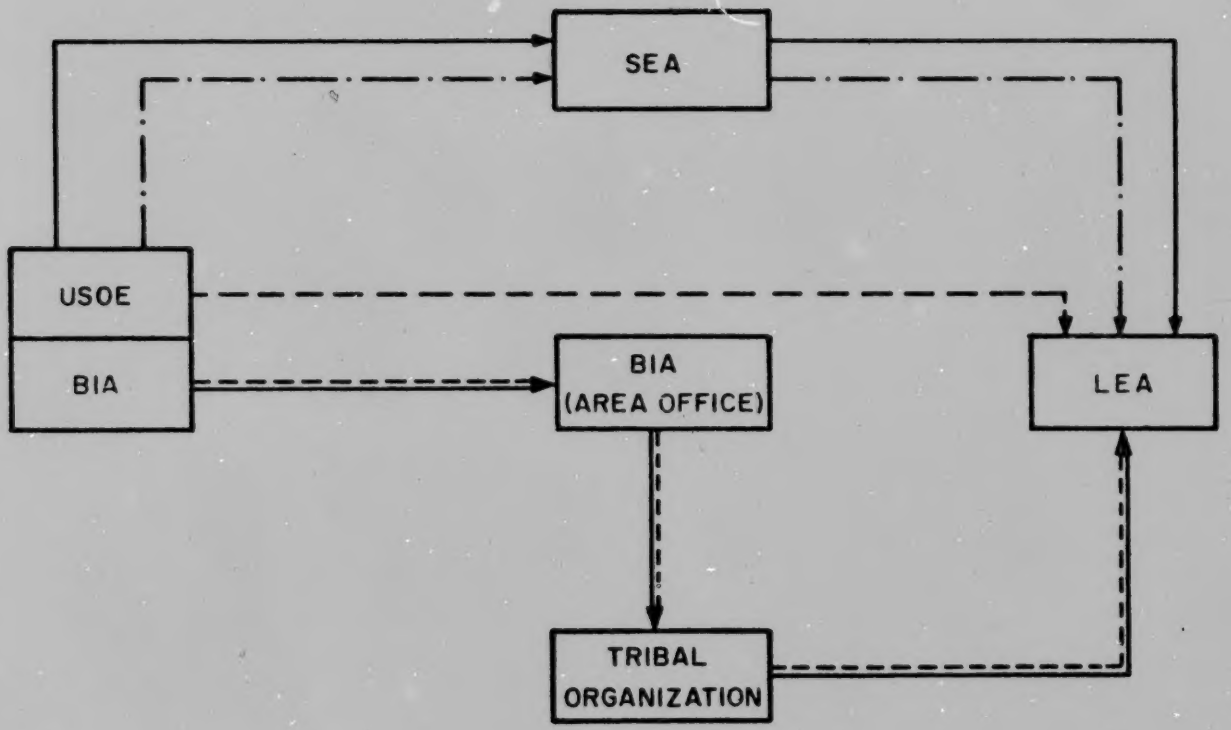


LEGEND:

TITLE I

TITLE IV

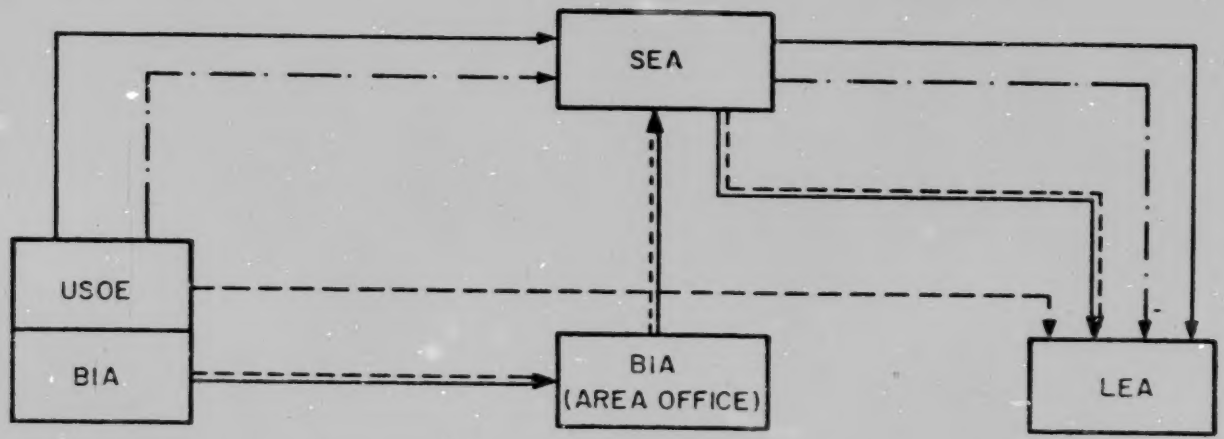
PL-874

JOHNSON O'MALLEY

0083

FUNDS FLOW DIAGRAM

State: I



TRIBAL ORGANIZATION

LEGEND:

TITLE I

TITLE IV

PL-874

JOHNSON O'MALLEY

APPENDIX II.-B: DATA SUMMARIES

The charts in this appendix present rating summaries by funding source within organizational level.

JOINT USOE/BIA STUDY DATA SUMMARY

SEA ■ LEA □ BIA □

TITLE I

SEA Numbers:	PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
1	4.4	4.3	4.8	5.0	4.3	5.0	4.9	5.0
9	4.0	3.3	3.6	4.2	4.0	4.4	4.3	4.3
6	5.0	4.5	5.3	4.7	4.3	5.0	4.5	5.3
7	4.6	4.2	4.2	5.0	5.0	5.0	4.9	5.0
4	5.6	4.3	4.7	4.3	4.5	5.0	4.8	6.0
3	5.0	4.0	4.5	4.7	4.0	4.3	4.4	4.7
2	5.8	4.4	5.6	5.0	5.5	6.0	4.8	6.0
5	5.0	5.5	5.0	4.2	5.0	5.0	5.0	5.0
8	5.0	5.0	4.9	5.0	5.0	5.0	4.7	4.7

6.0 Sound management functions noted to be operational, exemplary and worthy of dissemination.

5.0–5.9 Sound management functions noted to be operational, no need noted to improve.

4.5–4.9 Sound management functions noted to be operational, some need to improve weaker practices.

4.0–4.4 Sound management functions noted to be operational, critical need to improve weaker practices.

3.5–3.9 One or more management functions found to be non-existent; critical need to implement non-existent management practices.

3.0–3.4 Most management functions found to be non-existent; critical need to implement sound management practices.

BEST COPY AVAILABLE

JOINT USOE/BIA STUDY DATA SUMMARY

SEA ☐ LEA ☒ BIA ☐

TITLE I

LEA Numbers:	PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
1	4.5	5.5	4.9	5.0	5.0	5.0	4.9	4.7
2	4.5	3.7	3.8	4.8	4.0	4.3	4.7	3.7
15	4.8	4.7	4.7	5.0	4.7	5.0	5.0	5.0
10	4.5	3.5	5.0	5.0	4.0	4.7	4.9	5.0
12	4.7	4.3	5.0	4.3	5.0	5.0	5.1	4.7
11	5.3	4.8	4.7	5.0	4.3	5.3	5.3	5.0
8	4.8	4.3	5.0	5.0	5.0	5.0	4.9	5.0
6	4.0	3.8	3.6	4.0	4.0	3.7	4.4	4.3
5	4.0	4.7	4.6	4.5	5.0	4.0	4.8	4.0
7	3.7	4.0	4.3	4.7	4.3	4.7	4.8	4.0
4	5.0	4.5	4.8	5.0	4.5	5.0	4.8	4.3
3	5.0	5.0	5.0	5.0	4.0	5.0	4.8	4.7
9	5.3	5.0	5.0	5.0	5.0	5.0	5.0	4.7
14	4.4	3.9	4.3	3.3	4.0	3.5	4.4	4.8
13	4.3	4.7	4.8	4.9	5.0	5.0	5.0	4.8

6.0	Sound management functions noted to be operational; exemplary and worthy of dissemination.
5.0–5.9	Sound management functions noted to be operational; no need noted to improve.
4.5–4.9	Sound management functions noted to be operational; some need to improve weaker practices.
4.0–4.4	Sound management functions noted to be operational; critical need to improve weaker practices.
3.5–3.9	One or more management functions found to be non-existent; critical need to implement non-existant management practices.
3.0–3.4	Most management functions found to be non-existent; critical need to implement sound management practices.

JOINT USOE/BIA STUDY DATA SUMMARY

SEA ☐ LEA ■ BIA ☐

TITLE IV

LEA Numbers:	PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
1	3.7	4.3	4.1	4.0	5.0	4.3	5.3	4.7
15	4.7	4.2	4.6	5.0	5.0	4.0	4.8	5.0
10	5.0	3.8	5.2	5.0	4.0	4.3	5.3	5.0
12	5.3	4.5	4.8	4.0	4.0	4.0	5.0	5.0
11	5.0	5.0	4.4	4.5	5.0	4.7	4.8	5.0
8	4.3	4.7	4.6	4.0	4.4	4.0	4.3	5.0
6	4.3	3.8	4.9	4.3	3.0	3.3	4.8	4.7
5	4.7	4.0	4.1	4.2	3.8	3.7	5.0	5.0
7	4.7	4.0	4.3	4.0	4.0	4.3	4.8	3.3
4	4.7	4.5	4.2	5.0	4.7	4.3	4.8	4.7
3	5.0	4.3	4.3	4.3	4.0	5.0	4.5	4.7
9	4.7	5.0	5.0	4.0	5.0	5.0	4.8	4.7
14	4.8	3.0	3.0	4.0	4.0	5.0	5.1	5.0
13	4.7	4.6	4.4	4.7	4.8	4.0	4.7	4.3

6.0	Sound management functions noted to be operational; exemplary and worthy of dissemination.
5.0–5.9	Sound management functions noted to be operational; no need noted to improve.
4.5–4.9	Sound management functions noted to be operational; some need to improve weaker practices.
4.0–4.4	Sound management functions noted to be operational; critical need to improve weaker practices.
3.5–3.9	One or more management functions found to be non-existent; critical need to implement non-existent management practices.
3.0–3.4	Most management functions found to be non-existent; critical need to implement sound management practices.

JOINT USOE/BIA STUDY DATA SUMMARY

SEA ■ LEA □ BIA □

PL-874

SEA Numbers:	PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
1	3.0	4.0	4.0	4.3	4.3	4.0	4.0	3.8
9	3.0	3.2	3.5	3.8	3.2	3.6	4.3	3.5
6	3.0	3.5	4.0	3.8	3.5	3.6	4.3	4.3
7	3.0	3.7	4.0	4.3	3.5	4.3	4.7	4.3
4	3.0	4.0	4.2	4.1	3.8	4.0	5.0	4.3
3	3.0	3.7	3.8	4.0	3.8	4.3	4.7	4.3
2	3.0	3.3	3.5	3.3	3.3	3.3	3.3	3.7
5	5.0	3.8	3.7	4.1	3.3	4.0	4.7	4.3
8	3.0	3.7	3.7	3.9	3.5	3.6	4.3	3.5

6.0	Sound management functions noted to be operational, exemplary and worthy of dissemination.
5.0–5.9	Sound management functions noted to be operational, no need noted to improve.
4.5–4.9	Sound management functions noted to be operational, some need to improve weaker practices.
4.0–4.4	Sound management functions noted to be operational; critical need to improve weaker practices.
3.5–3.9	One or more management functions found to be non-existent; critical need to implement non-existent management practices.
3.0–3.4	Most management functions found to be non-existent; critical need to implement sound management practices.

0033

JOINT USOE/BIA STUDY DATA SUMMARY

SEA ☐ LEA ■ BIA ☐

PL-874

LEA Numbers:		PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
	1		5.0	5.0	3.8	5.0	5.3	3.7	5.0
	2		5.0	5.0	4.3	5.0	5.3	4.3	5.0
	15		4.0	4.0	4.0	4.0	4.0	4.5	4.0
	12		4.0	3.5	4.0	4.0	3.7	3.5	3.7
	11		4.0	4.0	4.5	4.0	4.0	4.7	4.0
	8		3.5	4.5	4.8	3.0	4.7	4.7	5.0
	6		4.5	4.0	4.0	3.0	3.7	4.0	3.7
	5		5.0	4.0	4.0	3.0	4.0	4.0	4.0
	7		5.0	4.0	4.8	5.0	4.7	4.3	5.0
	4		5.0	4.5	4.8	5.0	4.3	4.5	4.7
	3		5.0	4.0	3.8	4.0	4.0	4.0	4.0
	9		3.5	4.5	4.8	3.0	4.0	5.0	4.3
	14		5.0	4.5	4.8	3.0	4.7	4.3	4.7
	13		5.0	4.0	4.5	3.0	4.3	4.3	4.3

6.0 Sound management functions noted to be operational, exemplary and worthy of dissemination.

5.0–5.9 Sound management functions noted to be operational; no need noted to improve.

4.5–4.9 Sound management functions noted to be operational; some need to improve weaker practices.

4.0–4.4 Sound management functions noted to be operational; critical need to improve weaker practices.

3.5–3.9 One or more management functions found to be non-existent; critical need to implement non-existent management practices.

3.0–3.4 Most management functions found to be non-existent; critical need to implement sound management practices.

JOINT USOE/BIA STUDY DATA SUMMARY

■ BIA □

bers:		PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
	15	5.0	3.3	3.5	3.8	3.0	3.0	4.0	3.0
	11	3.0	3.0	3.0	3.3	3.0	3.3	3.3	3.0
	6	5.0	4.0	4.5	4.0	3.5	3.7	4.3	3.0
	5	4.0	3.0	3.5	3.8	3.0	3.3	3.7	3.0
	7	6.0	4.7	4.0	4.5	3.5	4.0	4.3	3.0
	4	3.0	3.3	3.0	3.3	3.0	3.0	3.0	3.0
	3	3.0	3.0	3.0	3.3	3.0	3.3	3.7	3.0
	9	5.0	3.3	3.5	3.0	3.0	3.3	3.3	3.0
	14	6.0	3.7	4.0	4.0	3.0	4.3	4.0	3.0
	13	6.0	3.7	3.0	4.3	3.0	3.7	5.0	3.0

6.0	Sound management functions noted to be operational; exemplary and worthy of dissemination.
-5.9	ound management functions noted to be operational no need noted to improve.
5-4.9	Sound management functions noted to be operational; some need to improve weaker practices.
4.0-4.4	Sound management functions noted to be operational; critical need to improve weaker practices.
3.5-3.9	One or more management functions found to be non-existent; critical need to implement non-existent management practices.
3.0-3.4	Most management functions found to be non-existent; critical need to implement sound management practices.

JOINT USOE/BIA STUDY DATA SUMMARY

SEA ■ LEA □ BIA □

JOM

SEA Numbers:	PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
1	3.0	4.3	3.9	4.1	3.4	3.8	3.8	3.7
9	4.2	4.6	4.7	4.6	3.8	4.6	4.7	4.5
7	3.2	4.4	4.1	4.5	3.7	4.3	4.3	4.3
3	3.0	4.4	3.7	4.6	3.3	4.0	4.0	4.3
2	3.6	4.1	4.0	4.3	3.7	4.2	4.3	4.0
5	3.7	3.8	3.8	3.8	3.3	3.8	3.5	3.8

6.0	Sound management functions noted to be operational; exemplary and worthy of dissemination.	**4.0–4.4**	Sound management functions noted to be operational; critical need to improve weaker practices.
5.0–5.9	Sound management functions noted to be operational; no need noted to improve.	**3.5–3.9**	One or more management functions found to be non-existent; critical need to implement non-existent management practices.
4.5–4.9	Sound management functions noted to be operational; some need to improve weaker practices.	**3.0–3.4**	Most management functions found to be non-existent; critical need to implement sound management practices.

JOINT USOE/BIA STUDY DATA SUMMARY

SEA ☐ LEA ☐ BIA ☒
JOM

BIA Numbers:	PROGRAM DESIGN	EVALUATION	DISSEMINATION	PROGRAM MANAGEMENT	TRAINING	TECHNICAL ASSISTANCE	ORGANIZATION	LEGISLATION
1	4.3	4.3	4.1	4.3	3.3	4.1	4.3	4.2
9	3.3	3.6	3.4	3.8	3.1	3.8	3.7	3.7
2	4.3	4.4	4.3	4.4	3.7	4.3	4.6	4.4
3	4.3	3.9	3.8	3.8	3.5	3.8	3.8	3.9
5	4.5	4.3	4.2	4.4	3.9	4.1	4.2	4.3
7	3.0	3.6	3.7	3.6	3.3	3.4	3.6	3.6
4	4.0	3.4	3.7	3.8	3.3	3.6	3.8	3.8
6	3.3	4.1	3.5	3.6	3.1	3.9	3.8	3.7
8	3.0	3.4	3.4	3.6	3.3	3.3	3.6	3.4

6.0	Sound management functions noted to be operational; exemplary and worthy of dissemination.
5.0–5.9	Sound management functions noted to be operational; no need noted to improve.
4.5–4.9	Sound management functions noted to be operational; some need to improve weaker practices
4.0–4.4	Sound management functions noted to be operational; critical need to improve weaker practices.
3.5–3.9	One or more management functions found to be non-existent; critical need to implement non-existent management practices.
3.0–3.4	Most management functions found to be non-existent; critical need to implement sound management practices.

APPENDIX II.-C: INTERVIEWEE RECOMMENDATIONS/COMMENTS

The following recommendations and/or comments were offered by personnel who were interviewed during the field visits. While it is realized that many of these recommendations were offered without consideration to all the legal and administrative constraints on the programs, it would be presumptuous to ignore them and not recommend that efforts be made to consider them.

Title I

- Title I programs should be funded, at a minimum of two years in advance. Present funding schedules do not permit for adequate program planning or staffing.
- Title I programs should be funded at 100 percent. Too many pupils who evidence needs for remediation are not being provided services because of the lack of money.
- In order to fully insure that children are getting the best possible education, there should be more coordination between state funded programs and Title I.
- In order to maintain continuity, USOE should follow-up SEA reviews with written findings and interpretations.
- Title I guidelines should be "air-tight", with little or no room for interpretation.

- More emphasis should be placed upon establishing programs in attendance areas that have demonstrated need, rather than the low income factor.

Title IV

- There should be coordination and communication with the Title I Organization concerning the needs of Indian children.
- Funding should be made in advance in order to fully allow for staffing and program planning.
- Funding levels should be raised to 100 percent in order to fully allow all Indian children who have demonstrated severe educational needs to participate in the programs.
- Title IV guidelines leave too much to interpretation. They should be rewritten and strengthened. (CTC note: Title IV guidelines do not exist).
- Information concerning the Title IV program (e.g., print-outs, policies, regulations, etc.) should be disseminated more quickly by USOE.
- Workshops for Title IV Directors should be implemented.
- USOE should provide funds to develop a Parent Committee Manual and should improve the methods of counting Indian children.
- USOE should develop procedures for the handling of complaints.

- USOE should make decisions on foster children's eligibility for Title IV.
- As long as Title IV works under the present legislation, it is not necessary to involve SEA personnel.
- Provision should be made for Indian cultural awareness workshops for non-Indians.

P. L. 874

- There should be a combined information system for P. L. 874 and Johnson-O'Malley.
- There should be a more efficient system of processing applications by the SEA/USOE to insure timely allocation of funds.
- USOE should provide more information to LEAs concerning eligible federal properties.
- Funding should be full and in advance.
- P. L. 874 should have administrative costs for on-site assistance, survey forms and property inspection.
- USOE should forecast P. L. 874 funding levels. (CTC note: USOE does forecast and notifies the SEA).
- USOE should strengthen, or establish where necessary, the Regional Offices to provide more assistance to SEAs/LEAs.
- A general review of P. L. 874 should be made to check on the misuse of P. L. 874 funds.

Johnson-O'Malley

- Documentation concerning parental involvement should be defined more clearly.
- There should be more monitoring of program and fiscal activities at the LEA level.
- There should be coordination of budget cycles between area offices and Congress.
- The JOM contracting process should be explained to the Indian community.
- A standard formula to determine JOM funding on a per pupil basis should be developed.
- Full and advanced funding should be implemented.
- New and improved regulations are needed to tighten control of JOM.

APPENDIX II-D: FINDINGS AND DISCUSSION FOR INDIVIDUAL SITES

This appendix contains a discussion of findings for each of the various sites visited. State names have been deleted and code letters substituted.

INDIVIDUAL STATES

State A

Title I

BIA 1. Although Title I funds flow through the BIA, an analysis of the management functions of the BIA for Title I was not within the purview of CTC.

SEA 1. As shown by the study data, each of the given areas exhibits operationally sound management functions. Program design and evaluation, however, are shown to be in critical need of improvement while each of the others are merely in need of some improvement.

LEA 1. With the exception of program design, dissemination, organization and legislation, this LEA is shown to have an adequate management approach to Title I. There is a need, however, to improve the weaker practices in the areas mentioned.

LEA 2. The areas of evaluation, dissemination and legislation are in critical need of implementation of nonexistent management practices. Training and technical assistance are shown to exhibit operationally sound management functions with a critical need to improve weaker practices. Similarly, program design, program management and organization exhibit operationally sound management functions with some need to improve weaker practices.

Title IV

BIA 1. The BIA has no management responsibility concerning Title IV, since these funds go directly to Indian Tribes and/or organizations.

SEA 1. The SEA has no management responsibility concerning Title IV, since these funds go directly to Indian Tribes and/or organizations. Furthermore, SEA management of Title IV is not legislated.

LEA 1. Program design lacks one or more of the management functions and is in critical need of implementation.

Each of the other given areas is shown to have operationally sound management functions with evaluation, dissemination, program management and technical assistance noted as in critical need of improvement of management weaknesses while the remaining areas had either some or no need of improvement.

Public Law 874

BIA 1. The BIA has no management functions concerning P. L. 874, since the program funds go directly to SEAs.

SEA 1. Since some or most of the management functions are nonexistent in the areas of program design and legislation, the data would suggest that there is a critical need to implement nonexistent management practices. In the remaining areas, although sound management functions are found to be

*Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

operational, there is a critical need to improve the weaker practices.

LEA 1. The study data indicated that the management functions of evaluation, dissemination, training, technical assistance and legislation are operational and in no need of improvement. However, the management functions of program management and organization seem to be lacking, and there exists a critical need to implement these nonexistent practices.

LEA 2. The study data indicated that all the areas are operating soundly with no need for improvement. Program management and organization, however, manifest a critical need to improve the weaker practices.

Johnson-O'Malley

BIA 1. The data suggest there is a critical need for improving the management functions in all of the otherwise operationally sound areas, with the exception of the training area where there is a critical need to implement sound management practices since most management functions were found to be nonexistent.

SEA 1. The survey data would indicate there is a critical need to improve the management functions in the areas of evaluation, dissemination and program management. In the areas of training, technical assistance, organization and legislation, since one or more of the management functions are nonexistent, there is a need to implement the nonexist-

ent management practices. Likewise, there is a critical need to implement sound management practices in the area of program design since most management functions in this area are nonexistent.

LEA 1, LEA 2. These LEAs have no Johnson-O'Malley funding and, therefore, did not fall within the purview of this study.

State B

Title I

BIA 2. Although Title I funds flow through the BIA, an analysis of the management functions of the BIA for Title I was not within the purview of CTC.

SEA 2. This SEA exhibited a strong management approach to Title I; however, there is a need for improvement in evaluation.

LEA 3. The data show that this LEA exhibits a sound approach to the management of Title I with some need to improve the weaker practices in the area of training.

LEA 4. The data would suggest that the area of legislation seems to be operationally sound in terms of management functions; however, there exists a critical need to improve weaker management functions. The areas of evaluation, dissemination, training and organization are, likewise, operationally sound but exhibit only some need to improve in weaker practices. The remaining areas exhibit sound management functions in operation with no need of improvement.

Title IV

BIA 2. The BIA has no management responsibility concerning Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

SEA 2. The SEA has no management responsibility concerning Title I, since the funds for this program go directly to Indian Tribes and/or organizations.

LEA 3. The data suggest that in the areas of organization and legislation sound management functions are in operation, but there also exists a need to improve some of the weaker practices. The data further suggest that in the areas of evaluation, dissemination, program management and training, while sound management functions do exist, there is a critical need to improve some of the weaker management practices In the areas of program design and technical assistance, the management functions that are in operation are in no need of improvement.

LEA 4. Dissemination and technical assistance exhibit a critical need to improve weaker management practices, while each of the other areas show some need for improvement. The need for improvement notwithstanding, all of the given areas were found to have operationally sound management functions in evidence.

Public Law 874

BIA 2. The BIA has no management responsibility concerning P. L. 874, since the funds for this program go directly to SEAs.

Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

0053

SEA 2. The data suggest that since most of the management functions are nonexistent in all the specific areas, there is a critical need to implement sound management practices.

LEA 3. The data analyzed reveal that while management areas show evidence of sound functions, there is a critical need to improve the weaker practices. The only exception is in the area of evaluation which was found to need no improvement.

LEA 4. The management areas manifest sound and operational management functions with a need for improvement in the weaker areas.

Johnson-O'Malley

BIA 2. The data indicate that there is a critical need to improve the weaker practices of the management functions in all the areas except training where there is a critical need to implement sound management practices since one or more management functions are found to be nonexistent.

BIA 3. With the exception of program design where there is a critical need to improve the management functions already operational, there is a critical need to implement sound management practices in the areas where some or all of the management functions are nonexistent.

SEA 2. The data would suggest, since one or more management functions are nonexistent in the areas of program design, training and legislation, there is a critical need

lement the nonexistent management practices. Although management functions are found to be operational in maining areas, there is still some need to improve aker management practices.

The data indicate that in all the areas, since some t of the management functions are found to be non- nt, there is a critical need to implement the non- nt management practices.

The data indicate that in all the areas, since f the management functions are found to be nonexistent, is a critical need to implement the nonexistent manage- ractices.

D

Title I

Although Title I funds flow through the BIA, an anal- f the management functions of the BIA for Title I was thin the purview of CTC.

While each of the given areas has operational and management functions, both evaluation and program man- t are shown to be in critical need of improvement of practices while program design and legislation were to need no improvement. The remaining areas have been to need merely some improvement in the weaker of management practices.

Both program design and evaluation have opera- lly sound management functions and a critical need

(respectively) to improve some weaker practices in those functions. Likewise, in the area of organization there is shown to be sound management functions in operation with some need to improve some of the weaker management practices.

Title IV

BIA 5. The BIA has no management responsibility concerning Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

SEA 4. The SEA has no management responsibility concerning Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

LEA 8. The data suggest that the areas of program design, program management, training, technical assistance and organization were found to be in critical need of improvement of management practice weaknesses while each of the other areas evidences a need for only some or no such improvement. All of the given areas were found to have operationally sound management functions.

Public Law 874

BIA 5. The BIA has no management responsibility concerning P. L. 874, since the funds for this program go directly to SEAs.

SEA 4. The data would suggest that since some or most of the management functions are nonexistent in the areas of

*Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

program design, technical assistance and training, there is a critical need to implement the nonexistent management practices. In the areas of evaluation, dissemination, program management and legislation, where there are sound operational management functions in operation, there is still a critical need to improve the weaker practices.

LEA 8. The data would suggest that for most of the areas there is little or no need for improvement of management functions with the exception of evaluation and training where some or all of the management functions are nonexistent.

Johnson-O'Malley

BIA 5. The data above suggest that there is a critical need to improve management functions, except in the area of program design, where only some need for improvement of management functions is cited, and in the area of training where one or more of the management functions were found to be nonexistent with a critical need for the implementation.

SEA 4. There is no involvement of this SEA with Johnson-O'Malley because the narrow interpretation of rules and regulations excludes them at this time.

LEA 8. There is no involvement of this LEA with Johnson-O'Malley because the narrow interpretation of rules and regulations excludes them at this time.

State E

Title I

BIA 6. Although Title I funds flow through the BIA, an analysis of the management functions of the BIA for Title I was not within the purview of CTC.

SEA 5. While each of the given areas is noted to have operationally sound management functions, the data suggest that program management is in critical need of improvement of management practice weaknesses.

LEA 9. With the exception of program design, each of the given areas is in some need of improvement of management practice weaknesses on their otherwise operationally sound management functions. The data would indicate that for the area of program design no improvement is needed.

Title IV

BIA 6. The BIA has no management responsibility concerning Title IV, since the funds for this program go directly to LEAs.

SEA 5. The SEA has no management responsibility concerning Title IV, since the funds for this program go directly to LEAs.

LEA 9. The data would suggest that in the areas of evaluation, dissemin ation, training and technical assistance, the management functions in operation are in no need of improvement. However, in the areas of program design, organization and legislation, the management functions in operation are sound, but there is a need to overcome weaknesses in some of

Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs

the weaker management practices. In the area of program management, the management functions in operation are sound; however, there is a critical need to improve some of the weaker management practices.

Public Law 874

BIA 6. The BIA has no management responsibility concerned with P. L. 874, since the funds for this program go directly to SEAs.

SEA 5. The data would suggest that there is a critical need to improve the weaker management functions in the areas of program management, technical assistance and legislation. In the areas of evaluation, dissemination and training, since some or most of the management functions are found to be nonexistent, there is a critical need to implement nonexistent management practices.

LEA 9. The data indicate that there is some need to improve management functions in the area of dissemination and program management and a critical need to improve them in the area of technical assistance and legislation. Since one or more management functions are found to be nonexistent in the area of evaluation and most management functions are nonexistent in the area of training, there is a critical need to implement sound management practices.

Johnson-O'Malley

BIA 6. The data would indicate that since some or most

of the management functions were nonexistent in the areas of program design, dissemination, program management, training, organization and legislation, there is a critical need to implement nonexistent management practices. However, where operationally sound management functions in the areas of evaluation and technical assistance are noted, there is a critical need for the improvement of the weaker practices.

SEA 5. The data would indicate, in all of the areas, since some or most of the management functions are found to be nonexistent, there is a critical need to implement the nonexistent management practices.

LEA 9. In all the areas, with the exception of program design, there is a critical need to implement the nonexistent management practices since some or most of the management functions are nonexistent.

State C

Title I

BIA 4, BIA 3. Although Title I funds flow through the BIA, an analysis of the management functions of the BIA for Title I was not within the purview of CTC.

SEA 3. The data suggest that evaluation, training, technical assistance and organization each are in critical need of improvement of management practice weaknesses, while the others are merely in need of some such improvement. All of the given areas were noted to have operational

and sound management functions.

LEA 5. For the areas of technical assistance, legislation and program design the data suggest nonexistence of one or more management functions and a critical need to implement those functions. Each of the other given areas is shown to have operationally sound management functions with some need of improving practice weaknesses. For program design, however, though operationally sound, the data does suggest critical need to improve some weaker practices.

LEA 6. The data suggest that both organization and legislation exhibit operationally sound management functions with a critical need to improve weaker management practices. Each of the other given areas was found to be devoid of one or more management functions and was in critical need of implementation of sound management practices where deficiencies existed.

LEA 7. Program design, evaluation and legislation are devoid of one or more of the management functions and are in critical need of implementation of those functions, while each of the other given areas exhibits operationally sound management functions with dissemination and training in critical need of improvement of practice weaknesses and the remaining areas merely requiring such improvement to some extent.

Title IV

BIA 4, BIA 3. The BIA has no management responsibility

*Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

concerning Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

SEA 3. The SEA has no management responsibility concerning Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

LEA 5. Training and technical assistance were found to lack at least one of the management functions and each had a critical need of implementation of such functions. Dissemination, evaluation and program management exhibited a critical need of improvement on certain management practice weaknesses, while the remaining areas were shown to need either some or no such improvement; however, this entire group of areas was found to have operationally sound management functions in general.

LEA 6. Training, evaluation and technical assistance were devoid of most of the management functions and in critical need of implementation of those functions, while evaluation lacked at least one management function and was likewise in critical need of implementation. The other areas were found to have operationally sound management functions with program design and program management exhibiting a critical need while the remaining areas exhibited either some or no need of improvement of management practices.

LEA 7. The data suggest that the area of legislation was found to be devoid of management functions with a critical need to implement sound management practices. Both program

design and organization are shown to be in some need of improvement while each of the remaining areas are shown to be in critical need of improvement of management practices. All but legislation were found to have operationally sound management functions.

Public Law 874

BIA 4, BIA 3. The BIA has no management responsibility concerning P. L. 874, since the funds for this program go directly to SEAs.

SEA 3. Since some or most of the management functions are found to be nonexistent in the areas of program design, evaluation, dissemination and training, there is a critical need to implement the nonexistent management practices. Likewise, there is a critical need to improve the weaker practices of the management functions in the areas of program management, technical assistance and legislation. However, there is only some need to improve the weaker management functions in the area of organization.

LEA 5. The data suggests since most management functions are found to be nonexistent in the training area, there is a critical need to implement sound management practices. The remaining areas, with the exception of evaluation, are considered to have sound and operational functions, but in critical need of improving the weaker practices.

LEA 6. The study data indicate that the management functions of evaluation are operational with little need

to improve the weaker practices; whereas, the management functions of dissemination, program management, technical assistance, organization and legislation are in critical need of improving the weaker practices. As regards the areas of training, most management functions are found to be nonexistent; hence, a critical need to implement sound management practices.

LEA 7. Sound management functions are noted to be operational in the areas of dissemination and organization, but there was evidence to suggest that there is a critical need to improve weaker practices. Likewise, the management functions of program management and technical assistance, although sound and operational, manifest some need for improvement of the weaker practices.

Johnson-O'Malley

BIA 4. The data would suggest in most of the areas, since one or more management functions seem nonexistent, there is a critical need to implement the nonexistent management practices. However, in the area of program design where there are in existence operationally sound management functions, there is a critical need to improve the weaker practices.

SEA 3. The data suggest there is some need to improve the management functions in the areas of evaluation and program management and a critical need for improvement in the areas of legislation, technical assistance and organization. In the area of dissemination, where one or more

of the management functions are nonexistent, and in the areas of program design and training, where most management functions are nonexistent, there is a critical need to implement the nonexistent management practices.

LEA 6. In the area of dissemination, there is some need to improve the weaker management practices; whereas, in the areas of evaluation, program management and organization, there is a critical need to improve the weaker management practices. Since some or most of the management functions are nonexistent in the areas of training, technical assistance and legislation, there is a critical need to implement the nonexistent management practices.

LEA 7. There is some need to improve the weaker management practices of evaluation and program management and a critical need to improve them in the areas of dissemination, technical assistance and organization. Since some or most management functions are nonexistent in the areas of training and legislation, there is a critical need to implement the nonexistent management practices.

State F

Title I

BIA. There is no BIA involvement in Title I since the funds for this program go directly to the SEAs.

SEA 6. Each of the given areas has operationally sound management functions with training being in critical need

to improve some weaker practices and both dissemination and legislation are shown as not being in need of improvement while the remainder of the others show need of some improvement.

LEA 10. The area of evaluation is devoid of one or more management functions and is in need of implementing sound management functions. In the area of training there is a critical need of implementation of management practices. Each of the other areas is shown to have exhibited operationally sound management functions with some need to improve weaker practices.

Title IV

BIA. There is no BIA involvement in Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

SEA 6. There is no SEA involvement in Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

LEA 10. The data suggest that all but one of the given areas has operationally sound management functions and the one exception (evaluation) was found to lack at least one management function as well as to be in critical need of implementation of such deficient functions. The other areas were found to range from critical need (training and technical assistance) to no need for improvement of management practices.

Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

Public Law 874

BIA. The BIA has no involvement in P. L. 874, since the funds for this program go directly to SEAs.

SEA 6. The data indicate that there is a critical need to improve the weaker management functions in the areas of dissemination, organization and legislation. In the remaining areas, since some or most of the management functions are found to be nonexistent, there is a critical need to implement the nonexistent management practices.

LEA 10. This LEA has no involvement in P. L. 874 because of the nonexistence of eligible federal properties.

Johnson-O'Malley

BIA. The BIA has no management responsibility concerning Johnson-O'Malley. Furthermore, the study did not require an analysis of the management functions of the BIA for Johnson-O'Malley in this state.

SEA 6. This state has no involvement in Johnson-O'Malley because federal legislation excludes them.

LEA 10. This LEA has no involvement in Johnson-O'Malley because the narrow interpretation of the rules and regulations exclude them at this time.

State G

Title I

BIA 7. Although Title I funds flow through the BIA, an

analysis of the management functions of the BIA for Title I was not within the purview of CTC.

SEA 7. Evaluation and dissemination are in critical need of improvement of some management function weaknesses found within their otherwise operationally sound management functions. The remaining areas are noted to need either some or no improvement in management practices.

LEA 11. The data indicate that the area of training exhibits a critical need to improve some weaker practices in its otherwise operationally sound management functions, while both of the areas of evaluation and dissemination exhibit the same soundness in management functions with only some need to improve weaknesses.

LEA 12. The data suggest for the areas of evaluation and program management that sound management functions are operational as they also are for program design and legislation; however, for both evaluation and program management there exists a critical need to improve practice weaknesses while for program design and legislation there exists only some need.

Title IV

BIA 7. The BIA has no management responsibility concerning Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

SEA 7. The SEA has no management responsibility concerning Title IV, since the funds for this program go directly to

Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

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Indian Tribes and/or organizations.

LEA 11. The data suggest that each of the given areas has operationally sound management functions which generally are in need of some or no improvement of management practices.

LEA 12. The data indicate that the given areas all have operationally sound management functions with program management, training and technical assistance showing critical need of improvement of certain practices while the other areas were found to be in need of either some or no such improvement.

Public Law 874

A 7. The BIA has no management responsibility concerning P. L. 874 because the funds for this program go directly the SEA.

7. The data would suggest that, since some or most the management functions are found to be nonexistent in areas of program design, evaluation and training, there critical need to implement nonexistent management tices. Likewise, there is a critical need to improve eaker practices of the management functions in the of dissemination, program management, technical tance and legislation. However, there is only some to improve the weaker management functions in the areas nization.

The data suggest there is some need to improve ment functions in the areas of program management

and organization, but a critical need to improve them in evaluation, dissemination, training, technical assistance and legislation.

LEA 12. The data indicate that the management functions are sound and operational in the areas of evaluation, program management and training, but they are in critical need of improving their weaker practices. Since one or more management functions are found to be nonexistent in the areas of dissemination, technical assistance, organization and legislation, there is a critical need to implement nonexistent management practices.

Johnson-O'Malley Act

BIA 7. The study data indicate that there is a critical need to implement sound management practices in all of the areas since some or most of the management functions were found to be nonexistent.

SEA 7. The data would indicate in the areas of program design and training, where some or most of the management functions are found to be nonexistent, there is a critical need to implement nonexistent management practices. In the remaining areas, although the management functions are sound and operational, there is still a critical need to improve the weaker management practices.

LEA 11. The data indicate that in all areas, since most of the management functions are found to be nonexistent, there is a critical need to implement the nonexistent

management practices.

LEA 12. This LEA has no involvement in Johnson-O'Malley because the narrow interpretation of Johnson-O'Malley rules and regulations excludes them at this time.

State H

Title I

BIA 8. Although there is a flow of Title I funds through the BIA, an analysis of the management functions of the BIA for Title I was not within the purview of CTC.

SEA 8. The data indicate that each of the given areas has operational and sound management functions with only some need of improvement on practice weaknesses.

LEA 13. The data suggest that each of the given areas exhibits operationally sound management functions, while only program design reveals a critical need for improvement of practice weaknesses with each of the others requiring merely some such improvement.

Title IV

BIA 8. There are no BIA involvements in Title IV since the funds for this program go directly to Indian Tribes and/or organizations.

SEA 8. There is no SEA involvement in Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

Notes - in Appendix II-D, there are two repeated mistakes.

A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,

B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

LEA 13. Dissemination, technical assistance and legislation were found to have a critical need of improvement of certain management practice weaknesses, while the other given areas were found to have either some or no need of such improvement. All of the areas were found to evidence operationally sound management functions.

LEA 14. Evaluation and dissemination are devoid of most of the management functions and are in critical need of implementation of such functions. Program management and training are shown as being in critical need, while each of the remaining areas are shown to be in either some or no need of improvement of management practice weaknesses. All of these latter areas were found to evidence operationally sound management functions.

Public Law 874

BIA 8. There are no BIA involvements in P. L. 874, since the funds for this program go directly to SEAs.

SEA 8. The data show that, in terms of organization, there are sound management functions with a critical need for improvement of weaker practices. In the remaining management areas, there is a critical need to implement nonexistent management functions.

LEA 13. Analysis of the data show that management functions were nonexistent in the area of training. There is a critical need to improve weak activities in the remaining areas, with the exception of program design which

showed no need for improvement.

LEA 14. The data would suggest that for most of the areas there is little or no need for improvement of management functions with the exception of training, where there is a critical need to implement sound management functions since they are nonexistent, and organization, where there is a need to improve the otherwise operationally sound management practices.

Johnson-O'Malley

BIA 8. In all the areas where some or all the management functions are nonexistent, there is a need to implement sound management practices.

SEA 8. This SEA has no involvement in Johnson-O'Malley because in this state Johnson-O'Malley funds go directly to an Indian organization.

LEA 13. The data suggest that in the area of program management, there is a critical need to improve the weaker management practices. Also, since some or most of the management functions are found to be nonexistent in the areas of evaluation, dissemination, training, technical assistance and legislation, there is a critical need to implement the nonexistent management practices.

LEA 14. In the areas of dissemination, program management, technical assistance and organization, there is a critical need to improve the weaker management practices. There is also a critical need to implement the nonexistent

management practices where some or most of the management functions are found to be nonexistent. These areas are evaluation, training and legislation.

State I

Title I

BIA 9. Although there is a flow of Title I funds through the BIA, an analysis of the management functions for the BIA for Title I was not within the purview of CTC.

SEA 9. Evaluation and dissemination each lack some of the management functions and are in critical need of their implementation while each of the other given areas is shown to have operationally sound management functions with a critical need for improvement of some weak practices.

LEA 15. The areas of program design, evaluation, dissemination and training exhibit operationally sound management functions with some need to improve practice weaknesses.

Title IV

BIA 9. There is no BIA involvement in Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

SEA 9. There is no SEA involvement in Title IV, since the funds for this program go directly to Indian Tribes and/or organizations.

Notes - in Appendix II-D, there are two repeated mistakes.
A. CTC continues to state that Title IV goes to Tribes or Indian organizations - II-26, 29, 32, 34, 37, 42, 44, 47, 50,
B. CTC says that although there is a flow of Title I funds through BIA, the study did not look at this. The Title I funds through BIA are a set-aside for federal schools and do not affect the LEAs.

LEA 15. Each of the given areas has operationally sound management functions with both evaluation and technical assistance shown as having a critical need to improve management practice weaknesses while the others show only some or no need for such improvement.

Public Law 874

BIA 9. There is no BIA involvement in P. L. 874 since the funds for this program go directly to SEAs.

SEA 9. The data suggest there is a critical need to improve the weaker management functions in the area of organization. In the remaining areas, since some or most of the management functions are found to be nonexistent, there is a critical need to implement nonexistent management practices.

LEA 15. The data would indicate, in most areas, that there is a critical need to improve the weaker practices of the management functions, with the exception of the area of organization which indicated some need for improvement.

Johnson-O'Malley

BIA 9. For each of the areas there is a critical need to implement sound management practices since some or most of the management functions were found to be nonexistent.

SEA 9. The data indicate that there is some need to

improve management functions in the areas of evaluation, dissemination, program management, technical assistance and legislation. The data also suggest that there is a critical need to improve management functions in the area of program design and a critical need to implement nonexistent management functions in the area of training where one or more management functions are nonexistent.

LEA 15. The data indicate that in the areas of program management and organization, there is a critical need to improve the weaker management practices. Since some or most of the management functions are found to be nonexistent in the areas of evaluation, dissemination, training, technical assistance and legislation, there is also a critical need to implement the nonexistent management practices. There is no need to improve in the area of program design.

APPENDIX II-E: MANAGEMENT PROFILE OF THE SAMPLED SEA PLANNING UNITS

Introduction

The management survey portion of the joint United States Office of Education (USOE)/Bureau of Indian Affairs (BIA) study also included the assigned Communications Technology Corporation (CTC) responsibility of interviewing SEA Planning Directors, Officers, etc. The major purpose of such interviews was to obtain a profile of planning responsibilities and major activities across all programs in operation at the SEA. The survey instrument was constructed in three areas:

- Self-Evaluation
- Specific Comments/Evidence
- General Comments/Remarks

Two of the nine states visited did not have or could not locate a staff member who could be interviewed for the intended purpose. Each interview began with introductions and an explanation by CTC as to the overall study structure. The interviews were then conducted according to the structured interview instrument content. The results of the interviews are presented below in the following format:

- Question or statement presented to SEAs
- Response from all SEAs
- Comments from all SEAs

Findings

1. The SEA has either a unit established to carry out the major responsibility for planning, or specific staff members to whom planning is assigned.

   Two states replied "meets our needs with no improvement needed."

   Five states answered "meets our needs; however, improvement is needed." Comments or suggestions for improvement included reorganizing to put staff with planning responsibilities at a level equal to or, preferably, higher than that of Program Directors. In addition, the planning unit should report directly to the Chief State School Officer (CSSO). Some states believed specific procedures should be developed for the operation of the planning unit.

2. Major organizational units in the agency formally plan their own activities and formally link their planning with agency-wide planning.

   Two states replied as "meets our needs with no improvement needed."

   Four states answered "meets our needs; however, improvement is needed." Comments or suggestions for improvement included establishing a formal procedure or system for linking organizational unit planning with agency-wide planning.

   One state replied with "does not exist, but needed."

3. Specific planning responsibilities are formally assigned with each major organizational unit.

   One state replied "meets our needs, no improvement needed."

Four states replied "meets our needs; however, improvement is needed." Suggestions/comments included that planning assignments were made formally, but that planning seemed to be done on an informal (let's-meet-once-in-a-while) basis. One state commented, "We have just started moving in this direction."

One state replied "does not exist and is not needed." Suggestions/comments indicated that this state did not necessarily want specific planning responsibilities assigned because of the philosophical concept that everyone is a planner.

One state replied with "does not exist--but needed."

4. Within this state one staff member is recognized as the "planning officer" and other members report directly to him with respect to their work in planning.

Two states replied "meets our needs; however improvement needed."

Three states indicated "meets our needs; however improvement is needed." Suggestions/comments indicated one state had a one man staff and his only support was the computer. In another state the staff included two professionals, three graduate students and two clerical staff members. In still another state the planning officer had the responsibility but no one reported to him concerning anything.

One state answered "does not exist and not needed." Suggestions/comments included that the CSSO is recognized as the "Director" and the "planning"role is assigned to the assistant superintendents.

One state replied "does not exist--but needed."

5. The planning officer is directly responsible to the CSSO or to the deputy.

Five states answered "meets our needs with no improvement needed."

One state indicated "meets our needs; however improvement is needed."

One state replied "does not apply."

6. Planning documents are approved by the CSSO and the State Board.

All states indicated "meets our needs with no improvement needed."

7. There is a clearly understood planning cycle in the agency.

Two states replied "meets our needs with no improvement needed."

Four states answered "meets our needs; however, improvement is needed."

One state indicated "does not exist--but needed."

8. Compensatory Education Program goals are coordinated with, but not limited by, statewide educational goals for purposes of program design criteria.

Two states answered "meets our needs with no improvement needed." Suggestions or comments indicated that one state follows the federal regulations and thus has no need to establish procedures coordinating goals.

Three states replied "meets our needs; however improvement is needed."

One state indicated "does not exist--but needed."

(Note: The seventh state interviewed was not asked this question.)

9. Has a state plan for education been developed/ implemented?

Two states reported yes, with one state reporting that it is done annually and the other state reporting that it was done in August,1973. Both states had copies of the state plan.

Five states said no, with one state commenting that directives are supplied by the state superintendent. Goals and objectives have been written for the directives, but the interviewee suggested that this is not a state plan. Other states reported that an educational plan was one year away from being developed.

10. Has a statewide Title III Needs Assessment been developed/implemented?

All states reported yes. Two states reported that development was completed, but that the Needs Assessment had not been implemented. One state reported that the Needs Assessment output did not have sufficient validity for implementation and the results would moreover not be accepted.

11. How would you describe the influence of State Education plans on Federal Program Designs?

The comments were as follows:

- None.
- The state education plan assists in establishing priorities for Federal Program Designs.
- Coordinated evaluation for all programs is possible.
- Funds can be focused on identified problems.
- The desires of the parents are having the greatest influence on Federal Program Designs.
- Independent school districts are very autonomous. Therefore change is slow and selling ideas to LEAs is slow.

12. Is a copy of the state organization chart, state planning organization, etc., available?

All states reported yes.

13. Does this state have a Dissemination Plan?

Five states reported no. Two states reported yes. The reported comments were that some states had no formal plan out, that dissemination was being done and that dissemination activities were not formally planned. Some states had central communication centers or a single information specialist. One state had only a Title III dissemination plan, which was considered inadequate.

14. Does this state have an Evaluation Plan?

All states reported no. Comments indicated that one state was in the process of establishing this plan by January 1975. One state had only a Title III evaluation plan, which was considered inadequate. One state reported that each program had its own plan. Two states had standardized testing programs for selected grades. Most states agreed that a great need exists for a state evaluation plan, but time, resource and staff limitations have prevented any progress in this area.

15. General Comments/Remarks

The last portion of each interview was a general discussion of what each planning officer could offer to the CTC interviewer regarding recommendations, suggestions, problems, success, etc., at all management levels. The following is a compilation of those discussions:

- If there is duplication of services among programs, the cause would seem likeliest to lie with USOE.

- The state organization is committed to coordinating these programs, but it is a very difficult assignment.
- The planning unit finds it difficult to respond to the varied and everchanging Indian Education requirements. There is simply too much variation in legislative provisions.
- Many people feel threatened by Planning/Evaluation/Research, but continued emphasis in these areas is most important if their fears are to be dispelled. Some progress is being made; establishing a management-by-objectives system has already helped to change attitudes.

APPENDIX III

A. FISCAL STUDY SITE REPORTS

LEA 1

Title I

The basic thrust of the projects centered around four elementary attendance areas of the LEA within high school geographical boundaries. Although the scope of the projects may seem limited in terms of services available to meet the needs of educationally deprived children, the actual operation of the Title I projects proved otherwise.

The selection of participants and target areas went through a highly developed process. It utilized the quality assurance program approach (see attached addendum) rather than quantity-type operations in terms of program context. Funded components included remedial reading and communication skills among others with this breakdown of program expenditures and participants:

Category	% Expenditure
Administration	6.20
Instruction	76.78
Pupil Transportation	.81
Fixed Charges	14.67
Community Services	.73
Capital Outlay	.81
	100.00%

	Elementary #1	Elementary #2	Elementary #3	Elementary #4
Native	33.0	20.0	16.0	4.5
Negro	27.0	6.5	13.0	3.0
Caucasian	39.0	62.75	67.0	90.5
Other	1.0	1.75	4.0	2.0
	100.00	100.00	100.00	100.00

Examination of supporting documents for Title I expenditures showed no violation of rules and regulations. Inventory items listed in the application were sample-tested and proved to be accurate.

Secondary schools with heavy concentrations of Native children were without services from Title I funds. But the LEA administrators stated that comparable services were being provided from state and local resources. The concept of having comparable schools could not be deemed applicable to this LEA because the cost of living was actually higher in this state and tended to distort comparison because of the many factors influencing costs. The team, touring two of the four attendance area facilities, was impressed by the classrooms, equipment and personnel of the Title I projects.

Title IV

This urban project was attempting to meet the special needs of Natives in the school district in many ways. The team received a detailed explanation of all educational materials developed; interviewed program personnel to determine their role with the Native community; and examined

accounting records based on the Title IV instrumentation.

The Title IV program met many and broad needs of the Natives by implementing the following projects:

- Cultural Enrichment Day Camp for Native elementary students was contracted out to non-profit organizations, one of which is a Native corporation.
- Another component was directed at elementary students by providing teacher aides for classroom activities including a tutoring component to assist secondary students in the classroom curriculum.
- A career education and a self-image enhancement component provided opportunities that would otherwise not be available to Native students.

The self-enhancement project provided for Native resource persons to visit and relate to Native students in subjects such as arts and crafts, Native lanaguages, oral history and Native music. The urban Native students, on the other hand, were given the opportunity to visit Native villages and experience the atmosphere of a rural setting. The career education component was an education model designed to introduce elementary Native students to the various functions of the business world. A student corporation served as the mechanism through which funds were channeled, with the students "role-playing" various positions of the organization.

Other activities included publication of educational material that was available as resource aids to classroom teachers. Native Olympics were funded along with Native student clubs on the secondary level.

The team examined approximately 14.8 percent of Title IV expenditures for adequate documentation and compliance with Title IV rules and regulations. No serious violations of accounting principles nor non-compliances with Title IV regulations were discovered. Student ethnic groups within LEA 1 included:

Ethnic Group	Students	Percent
Caucasian	28,965	87.1
Negro	998	3.0
Native	2,408	7.3
Other	878	2.6

Based upon the above figures and a financial examination, the team concluded that the LEA is implementing an outstanding program with available federal resources (18.7 percent) to bring into reality the special educational opportunities for the Natives.

JOHNSON-O'MALLEY

LEA 1 did not receive any funds from the Johnson-O'Malley program.

P. L. 874

The accountability for P. L. 874 funds was divided among two or three major departments of the LEA. The Educational Services Department was responsible for all data relating to pupil accounting with the Department of Finance responsible for all cost expenditure information.

Internal control was both between departments and within each department.

Both departments utilized electronic computers in data extraction and program planning which in turn made the accounting more expedient in terms of cost and efficiency.

Membership survey data were test sampled relating to P. L. 874 claims. Examination showed no exceptions. The team noted that approximately 70 percent of the claims were submitted on the basis of students whose parents are on active duty with the armed services. No significant amount of claims were submitted based on the attendance of Natives in the LEA.

THE ADDENDUM Quality Assurance Program is basically a technique for monitoring an on-going program and assuring that the program gets the maximum benefits from its various inputs. Every program is, first of all, based upon certain needs. If there is no need, then the program should not be in existence. When Southwest Cooperative Education Laboratory is implementing the Oral Language Program and/or the Reinforced Readiness Requisites Program, we assume that there is a need for these programs to be in the schools. It then becomes the objective of these programs to meet these needs.

The needs were defined previously by a group of educators in the districts when they assessed the problems and decided to use the Oral Language Program and/or the Reinforced Readiness Requisites Program as a technique to

remedy existing situations. Once the needs have been defined, the entry level of the participants is defined. This is determined by the teacher's judgment, perhaps by the SWCEL Test of Oral English Production, or other assessment measures which may be applied to the students. The contrast of the entry picture to that which appears at the close of the school year should be due, primarily, to the program that has been used. It then becomes the goal of the program to move these children from a specified entry behavior to a desired terminal behavior. There are certain techniques, or teacher behaviors, which make this movement possible. The more the desired teacher behaviors are used, the more likely that the desired terminal student behaviors will be reached.

Similarly, the less the desired behaviors are used by the instructing teachers, the less likely the students will be to exhibit the desired behaviors at the end of the year. It is the task, then, of the Quality Assurance Specialist to implement various techniques to make certain that the desired teacher behaviors are, in fact, used as much as possible.

Quality Assurance never attempts to repair broken parts, rather, through a series of preventive maintenance techniques, it attempts to alleviate anticipated breakdowns. It is the same thing as purchasing a new automobile and taking good care of it; changing the oil, rotating the tires, making sure that the battery and radiator have the proper

levels of fluid in them, etc. The Quality Assurance Specialist performs the same task with the Oral Language Programs and/or the Reinforced Readiness Requisites Program that the garage mechanic performs on an automobile.

It is the technique for performing this preventive maintenance that makes the Quality Assurance Program unique. That is, the program developer specifies exactly what behaviors lead to student success. It is then the job of the Quality Assurance Specialist to make sure that these various techniques are being implemented by the teacher. The Quality Assurance Specialist does NOT set the standards of behavior, but merely looks to see whether or not the are being met.

The teacher's behavior may be specified as either goal-directed (that which greatly enhances the probability of the students' demonstrated desired terminal behavior) or random behavior (that which does not have a proven relationship to desired terminal student performance). The Quality Assurance Specialist then attempts to have the teacher use as much goal-directed behavior as possible. The teacher behavior is monitored by observation schedules in a classroom visitation situation.

Other situations are also set up to enhance the teacher's views of desired behaviors. Two of these are in-service meetings and presentation of test results to the teacher. It is obvious that the teacher cannot do an adequate job, if she does not understand the rationale behind the various techniques and programs that are being used and if she does not have feedback as to which of the

techniques are most effective. The Specialist assists in using goal directed behavior.

The Quality Assurance Specialist can help the teacher implement maximum teaching strategies more easily than can the person who is the instructional leader of the building. The instructional leader does not usually know the specific aims or goals of the Oral Language Program and has not had the training in their implementation and use. It is then the role of the Quality Assurance Specialist to make certain that the program is going smoothly and to account for the operation of the program in the local school district. The Quality Assurance Specialist operates in a preventive maintenance function, alleviating future problems which might exist by proposing solutions well in advance.

The goal of the Quality Assurance Program is to maximize program output. This means getting the most for the dollar invested by the Federal Government in the program, by the district in the teacher training programs, and ultimately, by the local taxpayer. The maximum output is defined as the ability of the student to enjoy school by gaining a better understanding of himself and his oral English abilities. Other residual benefits become improved, such as the teacher effectiveness due to the training techniques. The fact that these training techniques are reinforced periodically reduces their chance of extinction.[1]

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[1]The discussion of the Quality Assurance Program was taken from the LEA's Title I application for the 1973-74 school year.

LEA 2

This state school system was created as an independent state corporation for the provision of public education in the unorganized local governmental units. Exclusive management and control of all matters rests with the board of directors for the corporation consisting of nine members appointed by the governor of the State. The board of directors is empowered to develop a philosophy of education, principles and goals for the system. It also selects and employs the superintendent, approves the employment of school personnel and establishes salaries for the certified staff. The board also promulgates rules and regulations covering organization, policies and procedures, submits an annual operational budget, establishes, maintains, operates, discontinues and combines schools where it considers necessary, provides for school equipment and pays tuition costs of secondary students living in areas where high school programs are not available.

The school system administers the educational program for 125 rural communities and six military installations in 22 regional administrative areas and offices across the state. The operation and instruction in each school is guided by a local advisory school board elected by the community. Supportive services are offered by the state school system, the State Department of Education and other state agencies.

Title I

The target areas consist of 11 different geographical regions across the state. Aid for Dependent Children is the source of data used for determining the number of children from low-income families. An application is submitted from each geographical region for more than one of the 125 attendance areas. For example Region 3 includes the following schools:

	No. of Students Enrolled	Students from Low-Income Families
School 1	39	22
School 5	45	23
School 6	141	62
School 7	140	55
School 8	79	44
School 9	57	38

Based on the source data reviewed, 64.8 percent of the 125 attendance areas would qualify as eligible low-income districts.

With an estimated number of children enrolled in the School System at 17,847, approximately 57.3 percent are listed as attending on-base schools located on military installations and are not considered being from low-income families. The number of low-income students in the state school system averages 17.5 students per school. The state requires a minimum of eight students before a school

can be established. The state staffing formulas, which determine state aid, are shown below for classroom teachers:

Elementary Classroom Teachers (Grades K-8)*

Enrollment	Allowable No. Teachers	No. enrolled when additional staff considered**
8-24	1	1.5 at 20-24
25-39	2	Second at 25
40-59	3	Third at 45
60-79	4	Fourth at 70
80-99	5	Fifth at 90
100+	5+	One for each 25 pupils

Secondary Classroom Teachers (Grades 9-12)

Enrollment	Allowable No. Teachers	No. enrolled when additional staff considered
12-15	1	
16-35	2	Second at 20
36-55	3	Third at 40
56-75	4	Fourth at 60
76-95	5	Fifth at 80
96+	5+	One for each 20 pupils

*This schedule is also applicable to combined elementary and secondary enrollments when the enrollment is less than 12.

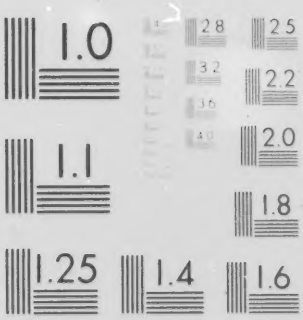
**If teacher housing is available.

The following table gives enrollment figures and number of teachers allocated by the State Legislature as for 1974

	Enrollment		Classroom Teachers	
	K-8	9-12	K-8	9-12
School 3**	674	390	33*	30*
School 1**	39	-	2	-
School 2**	148	52	7	3
School 4**	68	9	4	-

**Selected sites for this study.
*Include 15 special teachers such as counselors, music teachers, vocational education teachers, business, home economics, nurse, librarian, etc., for courses not considered as required core-curriculum.

The total allocation given to School #1 represents approximately 8.7 percent of the $110,121 consolidated package submitted from the area in question. The overall objectives stated in the application indicate that by May 1974, 90 percent of School #1 students would demonstrate increased achievement in math, science, English, spelling and social sciences. School #3, if funded for $85,000 and, as stated in the application, "with the intent of serving an individualized program for every student (368 students) in the target population," would use a Basic Skills Development Laboratory method stressing individual curriculum augmented with teaching centers and combined with direct teaching in English and mathematics. School #2 submitted a consolidated application covering six attendance areas which were allocated $82,684 and addressed and following supporting services: a cultural enrichment component, a bi-cultural component, an early childhood development component and individualized learning in basic skills (66.7 percent of the total application.)



MICROCOPY RESOLUTION TEST CHART

Documentation for disbursements were sample tested and verified as Title I expenditures. Survey data supporting the application were substantiated by the school district's files. Because school operations had ceased at the time of the visit, the team was physically unable to observe classroom operations. However, with a small number of students per school, it is possible that services are being provided unintentionally to students other than low-income children.

The amount of Title I funds available for fiscal year 1973 has been reduced by approximately $53,000 for expenses recorded in fiscal year 1973 that were applicable to fiscal year 1972. Approximately $102,000 of expenditures were disallowed because they were not considered within the Title I rules and regulations. The LEA administrators are currently disputing these disallowances of the Title I Program.

Title IV

The Title IV application was a consolidated proposal which represented all Natives in the unorganized state governmental units. The program is administered through a cental state school system office with the regional administrative officer providing supporting service to the schools within the regions. Input from the Natives comes through a Regional Native Education Committee, which in turn elects one member to serve on a State School System Federal Advisory

Board. The Federal Advisory Board then provides recommendations to the state school system administration concerning the contents of the Title IV program.

The application says: "This Board met on May 29, 1973, to make recommendations to the State School Administration on this proposal. Although a quorum was not present due to the extensive travel involved, other members were contacted by telephone and concurred with the recommendations".

The team believes this violates Sec. 186.13 - Approval of Applications, which states that, at a minimum, one public hearing should take place before an application could be submitted.

These recommendations were given for Title IV projects and activities:

- Community-school coordinators for all regions should participate in this program.
- Educational material and support services for Native studies should be developed.
- Educational training and planning for regional personnel should be developed.
- Educational training for para-professionals should be provided.
- Grants or mini-grants should be considered to rural schools who do not have access to federal resources.

The LEA 2 Central administation developed a proposal based upon the above recommendations and then allocated approximately 80 percent of the total funds to the regional offices. The breakdown of the allocation of funds is shown below:

Recipients	Percent	Amount
LEA 2 Central Office	20	$163,688
LEA 2 Regional Offices	32	261,688
Native Rural Schools	48	392,849
Total		$818,436

The funds given to the Native Schools were then allocated to the selected regions on a pro-rated basis of the total number of Native students in regional schools. The project areas included in this study are detailed below.

Region	Schools	Native Students
Region #1	10	1,112
Region #2	6	291
Region #3	7	595

The team questioned the arbitrary administrative portion (20 percent) of funds which the central state office receives. This seems to be an excessive amount for indirect costs. An audit report through June 30, 1973, stated: "Although the (State System) was established as an independent state corporation, it has continued to utilize the State Department of Administration for certain services". Various services provided by the divisions of the state government have not been billed to the state school system. For fiscal year 1973, the amount attributable to such services was computed by the Alaska State Department of Adminis-

tration as $511,000. Despite this amount records were examined which show that state school system central personnel also receive funds from the Title IV administrative component.

Johnson-O'Malley Funds

During the fiscal year 73-74 the Johnson-O'Malley Programs in this state were administered by the following organizations through contracts with the BIA Area Offices:

- Corporation #1
- Corporation #2
- Corporation #3
- LEA 2A
- SEA 1

Two of these corporations plus the other two contractors were awarded contracts to provide educational services and programs to Natives throughout the state. The statewide Johnson-O'Malley Review Committee (JOMRC) is comprised of a representative from each of the Native Regions. It was created on the recommendation from the State Board of Education to "maximize Native input" for Johnson-O'Malley Programs.

The duties and responsibilities of the committee are as follows:

- Policy making for the administration and distribution of Johnson-O'Malley funds.
- Advising the BIA on the needs and priorities for the Johnson-O'Malley funds.
- Reviewing applications for Johnson-O'Malley programs which in turn will provide the basis on which the JOMRC will make their program funding decision for fiscal year 1975.

An examination of available documents states in the regulations for the BIA Office Sec. 33.5 - General Requirements for Contracts: "To become eligible to participate in contract funds a state shall formulate a plan for the distribution of contract funds to local school units, which shall be acceptable to the Commissioner of Indian Affairs or his authorized representative". However, it could not be determined if the BIA interpreted this section as applying to profit and non-profit corporations awarded prime contracts from the area office. No plan of distribution was available or found at the time of the team visit.

A prime contract was awarded to Corporation #2 to provide a foreign studies program for 100 Native students to include three months in Europe. An analysis revealed the following approved budget for this foreign studies program.

	Salary 8-10 Mos.	Fringe Benefits	Room and Board Allowance	Tuition Costs 1st & 2nd Semester	Total
Director	$17,500	$1,750	$ 6,200	$ -	$ 25,450
Assistant Director (2)	15,300	1,530	8,000	-	24,830
Group Leaders (8)	32,000	3,200	14,400	-	49,600
Students (100)	-	-	180,000	50,120	230,120
	$64,800	$6,480	$208,600	$50,120	$330,000

Room, board and travel expenses in Europe were $4,500 for the director and $900 to $1,800 for each of the assistant directors, group leaders and students. All were in Europe for the same length of time. The contract specified that the students receive funds for extra-curricular activities at the rate of $100 per student per school year ($10,000) and $20 per month per student for nine months ($18,000) for spending money. Upon completion of the foreign studies program, the (100) students shall receive their high school diploma.

Other prime contracts included a counseling project awarded to Corporation #3. Also, a project for a "Cottage Style: Boarding Home Program" to SEA 1, a remedial reading component and a native curriculum development component for high school students to Corporation #1. A pilot project to establish a small village high school was awarded LEA 2A.

A breakdown of the Corporation's sub-contracts gives an indication of eductional activities provided by Johnson-O'Malley funds.

Category	Amount
Supportive Service	$ 406,973
Cultural Heritage Bilingual Programs	620,285
Counseling Programs	144,260
Supplementary Educational Efforts	194,838
Community or Local Efforts	168,592
TOTAL CONTRACT AMOUNT	$1,534,948

The SEA's contract with the BIA to provide Boarding Home Service for Native students exceeded 2.3 million dollars.

The following breakdown on a geographical basis shows the cost and the number of students receiving benefits from Johnson-O'Malley programs.

Location	No. of Projects	Amount	Native Students in Location
Location #1	8	$1,311,741	1,000
Location #2	5	368,207	1,129
Location #3	5	1,081,775	1,565
Location #4	3	809,289	540
Location #5	7	146,718	1,173
Location #6	7	240,573	791
Location #7	2	532,771	600
TOTAL	37	$4,491,074	6,798

The above schedules include the state boarding home program listed under the appropriate location which it serves. Also included are all prime contracts awarded by the BIA. The amount does not include the administrative component for Corporation #1 or SEA 1.

The team was told by a BIA representative that the BIA Area Finance Officer had conducted an audit of Corporation #1 contract two weeks before.

In attempting to form any conclusions, the team reviewed and discussed the BIA audit findings with the appropriate Corporation #1 and BIA officials. The review indicated that violations of the various contract clauses were discovered in the administration of Johnson-O'Malley funds by Corporation #1. But the contract also stated that the BIA, as a party to such contracts, is to "provide assistance to Corporation #1 and an accounting staff in

order that they can comply with accounting requirements." The team found that assistance was inadequate during the contract period because only one prior attempt by the BIA respresentatives was made to assist the Corporation #1 accounting staff with accounting requirements of the contract.

The team also discovered that, although the contracting officer at the BIA area level may have sign-off approval on contracts, no consideration is given two important items--the definition of accounting standards and contract interpretation on ambiguous clauses relating to financial reporting requirements. This results in confusion between the contractor and the BIA Area Finance Personnel in the performance of their duties.

The team could not determine criteria for awarding Johnson-O'Malley funds. But, as a minimum, the following clause referring to the allocation of funds was in each prime contract:

a) have eligible Native children attending schools possessing one-fourth or more degree of Indian, Aleut or Eskimo blood,

b) maintain standards of educational service equivalent to those by the state,

c) levy school taxes at a rate not less than the average for all similar type school districts in the state.

P. L. 874

P. L. 874 contributes approximately 51.7 percent of a 38 million dollar annual operating budget. The state

school system accounting records are maintained by the state based on accounting principles which differ in some respects from generally accepted accounting principles applicable to local and state school systems.

Revenues and expenditures are accounted for on a "program year" basis with an encumbrance system which allows for an accounting approximating the accrual basis, with the following exceptions:

- The date delivery of a purchase is requested.
- The date travel is scheduled to commence on a travel authorization.
- The date service is scheduled to commence on a contract for professional services.

State Statute Sec. 14.08.120 provides that:

> "All funds appropriated by the legislature for the operation of state-operated schools shall be paid by the Department of Administration upon requisition by the director of state-operated schools. These funds shall be made payable to the board of directors and shall be deposited in the school fund of the board of directors. The amount received may not be transferred to any other fund unless authorized by the board of directors and state law." (1 ch 46 SLA 1970)

According to the legal counsel for the state and the state school system, fund balances or deficits do not revert to the state under existing statutes. The Department of Administration, however, continues to treat the state school system in accordance with rules applicable to other state governmental agencies and insists upon reversion of fund balances to the state. Thus, there appears to be no incentive for state school system administrators to practice

budgetary management policies. On the other hand, because of the legal and administrative structure of the state school system, any deficit is automatically absorbed by the state if P. L. 874 funds are insufficient to cover all general operating expenses.

During the fiscal year 1973, the State Department of Education withheld $1,200,000 of P. L. 874 funds for which the state school system made application and should have received for school operations. An explanation given by state school system administrators during the on-site visit held that the funds withheld by the state supported the cost of education for students attending organized school districts but living in a geographical area which is within the jurisdiction of the state school system. The reimbursement method by which the organized districts receive such funds is included within the state aid program.

The team was not able to determine that the organized school districts did in fact receive, in addition to regular state aid, additional P. L. 874 funds from the state, and whether or not the organized school districts were also submitting claims for the same students as the state. The audit firm, which conducted an examination for the year ended June 30, 1973, concluded that the 1.2 million dollars was sufficient material to issue an adverse opinion. It said that the state school system general fund was not in conformity with generally accepted accounting principles applicable to local and state school systems. Its examination did not extend to the disbursement of the 1.2 million

dollars by the State Department of Education.

The team was of the opinion that in view of the above related facts, the state school system may be in violation of P. L. 874 rules and regulations Sec. 5(a)(2), which states:

> "No payments may be made during any fiscal year to any local educational agency in any state which has taken into consideration payments under this title in determining the eligibility of any local educational agency in that state for state aid, or the amount of that aid, with respect to free public education during that year or the proceding fiscal year, or which makes such aid available to local educational agencies in such a manner as to result in less state aid to any local educational agency which is eligible for payments under this title than such local educational agency would receive if it were not so eligible."

In consideration of the percentage of outside revenue that is derived from P. L. 874 to support the general fund operations in the state school system, the team recommends the responsible federal agencies pursue follow-up action to clarify the use of federal funds in these circumstances.

Title 1

LEA 4 has implemented a program for teaching English as a second language. The method used to implement the program was teaching the English language by training teachers and aides, providing technical use of equipment for reinforcement and reducing the ratio of students to adults in teaching components.

This was a cooperative project between LEA 4 and an adjoining school district which surrounds it. Therefore, it was feasible to enter into a joint project so that Indian children within the adjoining school district boundaries who lived closer to LEA 4 could be more conveniently served by LEA 4. No significant impact was found at LEA 4 in regard to Indian Education as it relates to the development, implementation and accountability of the Title I program. Seventy-five percent of the grant money went toward instructional staff to implement the program.

LEA 3 was implementing both a summer and a fall program. The project consisted of a remedial and an enrichment program to improve pupil performance in the academic areas with emphasis in reading and math. Approximately 80 percent of the Title I money was being used for instruction. Both of the programs at LEA 3 and 4 were spending a majority of the total budget on pupil instruction. Both schools were

considered districts which could be regarded as having a high concentration of children from low-income families and could be approved as project areas with each district considered an attendance area. Therefore, comparability did not present a problem.

Title IV

LEA 4 implemented an Indian Home-School Cultural-Curriculum Project, primarily to improve the Indian student's self-image, his appreciation for school, and his desire to learn. In addition, the program intended to acquaint Indian parents with what Indian students were doing in school while correspondingly learning what parents were doing in education in the home.

To implement the program, a cultural center was established in a mobile home classroom. Vehicles were purchased to bring parents into the center and the school to observe the daily activity of teacher and student. The teacher also visited homes and parent meetings to observe and discuss parent-student relationships and cultural habits.

The program received high praise from the administrators. The personnel in charge of the program were very enthusiastic toward the Title IV programs. The only significant finding was the fact that instructional costs were only 26 percent of the total budget of $144,833, which is below the average for Title IV projects surveyed. Seventy percent of the program budget went to purchase vehicles, equipment,

and supplies. Therefore, the first years's operational budget was spent largely on implementation costs and very little was spent on actual instruction.

No violations of the rules and regulations were noted at this site, and the administration of the funds was considered adequate from an accounting and internal control point of view.

LEA 3 implemented a "Creative School Attendance" project to increase attendance. It enriched the curriculum by coordination of physical education, assistance to the attendance officer, promotion of field trips and programs, provision of a good breakfast program and giving awards for perfect attendance. As at LEA 4, only a small portion of the budget (less than 15 percent) was expended on instructional costs. Fifty-six percent of the budget was expended on equipment and supplies, with the remaining 29 percent going to administrative fixed expenses and contracted services.

This again exemplifies the high initial costs of the program and a limited amount on actual instruction.

Johnson-O'Malley

LEA 4 was experiencing financial difficulties not encountered by any other school district reviewed. It had within its boundaries a number of BIA elementary schools. The high school children were being serviced by the recently completed $9 million school. Through negotiations between LEA and the BIA, the LEA entered into a joint venture with

the BIA whereby the LEA would design the curriculum and provide a certain number of instructors for the school. The school had two principals, one from the BIA and one from the LEA. The LEA provided all the plant operation and maintenance expenses and paid the BIA 30 percent of maintenance and operation charges as a depreciation factor.

The LEA received 20-25 percent of its finances for the 72-73 school year from Johnson-O'Malley funding. This heavy reliance upon Johnson-O'Malley basic support could have been alleviated if the LEA received adequate assistance from P.L. 874. The school district was receiving only $430 per student under P.L. 874 Part A eligibility--far less than the school needed to meet the basic foundation programs of the district. The team was unable to ascertain the reason for the inequity.

The ironic part is that LEA 4 did not receive its Johnson-O'Malley funding for 73-74. Because the school district had to continue to provide basic support programs, the school district issued warrants through the county to meet its expenses as they came due. The school district was not notified until June of the 73-74 year that Johnson-O'Malley money would not be available. As a result, the county has warrants outstanding for which they have not levied taxes.

This leaves the school district with the following alternatives: special levy, obtaining additional aid from the state, or seeking some type of federal emergency financing. What compounds the problem is that the majority of

the Johnson-O'Malley basic support money received went right back to the BIA in the form of operation and maintenance charges and to purchase the building through the 30 percent depreciation charge assessed by the BIA.

LEA 3 was experiencing an identical problem with Johnson-O'Malley funding. Johnson-O'Malley funding centered around the state's distribution formula which was considered inequitable and based upon erroneous calculation. Johnson-O'Malley basic support money made up 20 percent of the finances for the 72-73 fiscal year with a 24 percent projected need for 73-74 year. Again, at this site, the P.L. 874 impact money was far less than needed to provide basic foundation programs. The Johnson-O'Malley funds were not so acutely noticed because teacher housing was obtainable in a city 35 miles away, whereas the LEA 4 had to provide housing because the closest housing available was a city 74 miles away.

Also at LEA 3, the Johnson-O'Malley funds needed for 73-74 were not received and the LEA was not notified to that effect until June of 1974. Anticipating, from past experience, that this could happen, the administration cut expenses sufficiently to prevent the same situation experienced by LEA 4.

If Indian children were to receive benefits of a basic support program at these two locations, Johnson-O'Malley funds would not have to be relied upon to meet basic support programs.

LEA's 3 and 4 are good examples of what can happen when Johnson-O'Malley basic support money does not meet the basic needs of Indian Education and the school districts do not have sufficient tax base and assistance. This results in one school district not being able to meet its basic support programs and another with basic programs severely limited by lack of funds.

It is also a good example of what a varying P.L. 874 rate could do to provide basic support programs and special needs to Indian children. If the school administrations had negotiated a higher rate to meet the extraordinary needs of the district, the district could have fulfilled its responsibility. LEA 4, for example, could have obtained funds to provide housing and housing expenses for teachers coming to the reservation and also to transport Indian children within a 45 mile radius.

The administrators at the LEA were not aware of the content of the rules and regulations nor the fact that the P.L. 874 rate could be negotiated at the state level. They accepted the computation the state made and looked elsewhere for funds for their basic support programs. Johnson-O'Malley funding did not provide sufficient funds to meet the need, nor did Johnson-O'Malley contractors ask why Impact Aid was not handling minimal basic support needs. This is an example of the total lack of coordination between the BIA and SEA administrators.

LEA 5

Title I

Project activities included remedial reading, kindergarten components, mathematics, communicative arts and language development. These instructional activities represented 66.56 percent of available project funds. Supportive services included health, transportation, fixed costs, instructional administration and Title I administrative services. The combined estimated cost of instructional and Title I administration amounted to 81.18 percent of the total application submitted for funding. Estimated costs allocated to parents amounted to 0.0023 percent of available resources.

No problems were evident in the LEA's compliance with comparability regulations for services to attendance areas.

Title IV

A major portion of the funds was approved for a multilingual and multi-cultural curriculum development project directed mainly toward the Native student population. Also funded were home school liaison and counseling components, a vocational educational component and the construction of bus stop shelters by students enrolled in vocational building trades.

Although the construction component comes within the intent of meeting the education needs of Indian students,

the team questioned the use of funds in constructing school facilities with student labor under the definition of "minor remodeling." The regulations say minor remodeling means:

> "Minor alterations, in a previously completed building, which are needed to make effective use of equipment or personnel in space used or to be used for programs or projects meeting the assessed needs of Indian children. The term may include the extension of utility lines, such as for water and electricity, for a point beyond the confines of the space in which the minor remodeling is undertaken but within the confines of such previously completed building, to the extent needed to make effective use of the equipment. The term does not include structural additions to buildings, building construction, maintenance or repair."

Approximately 8.46 percent of the resources was available for parental activities and costs.

LEA 5 school district received approval to begin a Title IV program on July 11, 1973, pending receipt of a revised budget to be submitted by the LEA. A revised budget was submitted and approved by OE/HEW on September 10, 1973, funds to be released upon request by the LEA. As of April 30, 1974, the budget reports showed the following:

Approved Title IV Budget	$590,826.00
Title IV Grant Expenditures	65,211.00
Unexpended Balance	$525,615.00

Many outstanding purchase orders and vouchers were on file during the on-site field visit by the fiscal team. Examination of the records in great detail showed poor utilization of grant resources due to inadequate fiscal planning and/or program coordination and communication with program personnel. A questionable component of the Title IV program left unaddressed at the end of the field visit con-

cerned the funds budgeted for the school lunch. Although both the Parent Advisory Board and School Board approved the use of Title IV funds for this component, federal approval had not been received from Washington, D.C., as of May 30, 1974. The team listed the following justifications, as stated in the Title IV proposal:

- The price of staples within the school district has increased above the reimbursement increases.
- U.S.D.A. commodities are not available within the district.
- "Due to the fact that most of the meals served in the school program in this district are free or reduced, approximately 78 percent must continue to be free or reduced. Assurance of funding required if the normal quality and quantity of food is to be served."
- It would permit a wage increase for employees in the school lunch department, many of whom are parents of Indian students within the district.

The team also noted, based on the audit report, that approximately 59.3 percent of the revenue to support the entire cafeteria fund was from the federal lunch program. Portions of the remaining balance came from Johnson-O'Malley and Title I. A comparison of previous years' cafeteria funds would have to be made to determine whether or not existing resources are being supplanted.

Johnson-O'Malley

Approximately ten attendance areas are provided with a comprehensive full-day kindergarten component. Other

components include a communication skills system lab, TALK Centers (Teaching Activities and Language to Kids), instructional aides, a counselor and a health component. The following is a breakdown of resource allocations by component:

Kindergarten	26.60 percent
Communication Skills System Labs	14.47
TALK Centers	2.65
Instructional Aides	23.76
Health Programs	12.27
Parental Costs	8.69
Supplies and Travel Costs	7.75
Administrative Costs	3.81
	100.00 percent

The only non-educational component in the Johnson-O'Malley application was the Health Services project, involving a total of 27 Health Aides for a total component cost of $104,118. The work program provides that aides will provide:

- individual assistance and care in the treatment of nuisance diseases;
- visual care and correction;
- referrals for medical and dental care;
- instructions and assistance in personal hygiene;
- supervision of individuals going to and from hospitals and clinics on an outpatient basis.

The question here is whether or not health care in these circumstances is a basic support responsibility of the State, the county school district, the BIA or the Indian Publich Health Service.

The justification of the work program states: "Health aides will be employed to provide personal health services

in the elementary and secondary schools enrolling significant numbers of Johnson-O'Malley students." Defining where the ultimate responsibility for health care lies will determine whether or not this can be an audit exception.

P.L. 874

Documentation of claims on the application were sample-tested and cross-referenced with the LEA's files. The LEA administrators thought that both negative and positive effects of absenteeism on ADA should be considered in calculating the formula. This would be done by rewarding those LEAs with a decrease in absenteeism and penalizing those with an increase in absenteeism. All administrators considered the current funding too low to meet basic educational needs of the LEAs.

Other findings at the LEA regarded a legal suit against the State of New Mexico concerning the formula utilized to determine financial aid to the school district.

Title I

The majority of available resources under the Title I programs was directed at servicing the children in kindergarten classes located at four attendance areas. Other project activities were aimed at improving the reading ability of students in grades one through nine at eight different elementary attendance areas. Supportive services were evident from Title I funds in the areas of guidance and counseling and transportation.

The LEA had two attendance areas that were in violation of Sec. 116.26(a) of the Title I, ESEA regulation concerning comparability of services in the previous school year. Every effort was being made by the LEA to provide comparable services in those two attendance areas in the current school year by redeploying staff and resources. The LEA administrator of Title I felt the criteria utilized by the state along with the reporting format did not give adequate weight to staffing patterns and teacher-pupil ratios.

The Title I administrator stated that parental involvement was included in the Title I projects. Documents, minutes, applications, etc., on file at the LEA administration office verified his statements as to compliance with Title I rules and regulations. The combined cost of instructional and Title I administration amounted to 6.6 percent of the total application submitted for funding.

Title IV

Under this act an industrial arts class, auto mechanics class, remedial reading component and one secondary guidance counselor were funded. Approximately, 6.68 percent was allocated for administrative personnel. Although the LEA had not approved the indirect cost rate at the time of submitting the application for funding, an indirect cost rate of 3.20 percent was approved March 21, 1974 by the LEA.

Another finding involved statements given by the district superintendent concerning the Title IV and Johnson-O'Malley programs operated by the school district. He stated that both programs included only Indian students and that all budgeted items in both Johnson-O'Malley and Title IV were being used exclusively for Indian children.

Upon examination of the accounting records and the approved budget, the team noted that five overhead projectors were purchased with Title IV funds. Because the team arrived on-site during the last day of school, it was not able to verify his first statement but it visited School #1 facilities. The Title IV classroom facilities inspected were the mechanical drawing classroom, the remedial reading room, and auto mechanics classroom. This included all facilities being utilized by Title IV projects. During the visit, the five newly purchased projectors were not present or visible. Both the auto mechanics and the mechanical drawing instructors said they had no need for nor had received any projectors during the period of the Title IV project. No available ex-

planation could be obtained from School #1 officials as to the location of these projectors.

Johnson-O'Malley

Under this program, emphasis was placed on remedial reading and math in grades 1 through 12 with teacher aides supplementing five different elementary attendance areas. The above activities represented approximately 52 percent of available resources. Amounts allocated to administration amounted to 7.34 percent with no funds provided for any parental costs or activities.

The superintendent stated that Johnson-O'Malley was a problem in financial management due to the sub-contract procedure employed by the Tribal Councils who contracted from the BIA. Segregation of students in the Johnson-O'Malley program caused resentment among taxpayers who were parents of non-Indian children. He felt that if the federal government is going to fund Indian Education programs, such as Johnson-O'Malley, Indian people should be given control of their own schools to avoid the above conflict. He felt that the advisory board of Johnson-O'Malley should not dictate to a legally elected school board.

The director of Indian programs mentioned that the cost-reimburseable procedure used to draw Johnson-O'Malley program funds created a cash flow problem because county school board funds had to be used for such programs until Johnson-O'Malley funds became available. Hence, the Johnson-

O'Malley funds merely reimburse the county school board funds. He and the superintendent stated that the HEW Consolidated Program Information Report was a duplication of efforts in the data required to be submitted to Washington, D. C.

P.L. 874

The LEA administrators felt that P.L. 874 was the most efficient type of grant-in-aid program. They felt that unnecessary red tape was eliminated in the application process and this was very expedient for the administrator. They felt that more direct funding such as Title IV, with non-categorized aid such as P.L. 874, could serve the LEA's in a financially efficient and effective manner.

The only exception found in the P.L. 874 program was that the membership survey sheet was outdated. A membership survey on the application was dated October 20, 1972 for the current 73-74 school year. The P.L. 874 administrator stated that a new survey would be undertaken during the fall of 1974.

LEA 7

Title I

Presently, Title I funding is handled through the Federal Projects Division of the State Department of Education. State requirements for accountability of Title I funds say that separate accounting records be maintained for each Title I program. No effort has been made to re-program remaining prior years' fund balance into the subsequent program year. As a result, at the time of the review, separate accounting records for seven different Title I programs were being maintained.

Such a procedure appears to create excessive clerical effort. A more realistic approach would be to re-program carry-over fund balances into the new program year through approved budget amendments, thus transferring the reprogrammed funds into the current year for use in current program needs. Once the Title I program has been audited by the state or by an independent public accountant, no purpose is served by reopening the program year for subsequent changes such as sale of equipment which was purchased in a prior program year.

In addition, accountability of program fund balances will be better maintained if the control of fund balances is on a continuing basis. Such a procedure provides the State Department of Education with a continuing up-date

account of carry-over funds available on a combined state basis. Such amounts are documented in current program financial reporting and further documented by audit of Title I programs on a current and continuing basis.

Title IV

On June 5, 1973, an application for Title IV funds was submitted for a 12-month period beginning August 10, 1973. In addition, the school district had not received final payment under the Title IV grant as of June 4, 1974. The lateness of fund application and approval resulted in an inability to hire qualified personnel for the programs. School districts are hesitant to make salary commitments for special programs which could be disapproved for federal funding and thus require local revenues for financing.

Johnson-O'Malley

The Johnson-O'Malley program provides for the purchase of various instructional supplies and materials for use by the Indian children. A limited review indicated that the program was being properly monitored to determine which students qualified for Johnson-O'Malley funds and documentation of issuance of Johnson-O'Malley supplies received.

P.L. 874

As part of a House Bill amended by the state legislature, P.L. 874 funds are considered before arriving at the

amount of state money distributed to each school district for operating revenue. This appears to be in direct violation of the funding regulations of P.L. 874. A lawsuit is pending regarding the use of P.L. 874 money in the determination of the State Equalization Guarantee Distribution.

LEA 8

Title I

Title I programs at this site, as they relate to fiscal accountability, were the strongest of all sites visited. This is the direct result of having financial and human resources available to properly develop and implement a government program. The district has a planning and supporting services department which has the responsibility to develop and plan programs within the district.

The planning begins with the calculation of target areas based upon the following procedures:

- Number of students receiving AFDC times 1 (2 in school year 1974-75).
- Number of students qualifying for low-income times 1.
- Number of students receiving free or reduced lunches times 1.

The total children in these categories are totaled and presented as a percentage of total children in the school. This percentage is divided by district wide percentage to arrive at percentages for all schools.

All schools included in the summary must have percentages higher than the district wide percentage to qualify as an attendance area. This procedure is within the Title I rules and regulations and the district was in compliance. The district had considered private schools within the cal-

culations.

Once the attendance areas have been defined, the following methods are used in allocating funds to each school:

- The children in kindergarten and grades 1-2 are graded by the teachers in various areas of study such as ability, knowledge, etc., and scored. The higher the score, the greater the educational deprivation.
- The children in grades 4-6 are subjected to the same grading procedures along with a written test.
- The amount of $430 per student is divided into the total funds to arrive at the total number of students who can potentially be served.
- Funds are divided up to schools based upon highest scores of children in all attendance areas. A cut-off is made at the level where total students equal the maximum number of students who can be served.

Comparability calculations for attendance area schools were not difficult for this district because it was able to computerize the calculation to comply with the rules and regulations. No review was made of data being used in the calculation. The result of the calculation indicated that compliance was being made.

The program consisted of the following seven components.

- Primary reading team
- Intermediate reading team
- Instructional materials center
- Basic skills center
- Elementary math team
- Mathematics basic skill development

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. Mobile learning centers

Title IV

The Title IV grant totaled $319,269 with a non-federal portion that included $84,504. The objective of the program was to substantially increase the educational opportunities of Indian children and to employ the talents and resources of Indian organizations, parents, and other individuals in providing educational and supportive services to Indian school children.

The following breakdown of expenditures is for the federal portion only:

Instruction - social worker aides	29	percent
Supporting services:		
Pupil	18	
Parents	3	
Staff	20	
Health	6	
Transportation	5	
Administration	19	
Total	100	percent

This program was similar to the Title I program in the percentage of funds used for instruction. However, it did not reflect the high costs of start-up at this site. It substituted supporting service costs. Comparisons will show that this site is already supplying more supporting services per pupil than any other site reviewed.

Therefore, the need would appear to be more in instructional programs than supporting services. For example, a number of schools in the district had a comparable percentage of Indian children when compared to Title I schools. However,

the absence of other minorities in that school did not provide sufficient numbers of minorities to bring it up to percentage needed to become an eligible attendance area. These Indian students were not receiving Title I funds or programs in spite of need. It seems that the students' instructional and educational needs should be met before supporting services are given.

Johnson-O'Malley

This site did not receive any basic support or supplemental funds for Indian Education.

P.L. 874

This site received an insignificant amount of P.L. 874 funds which resulted from Part B eligibility criteria and had no impact on Indian Education.

LEA 9

Title I

Title I funding is generally directed in the areas of remedial math and reading programs. Several of the Indian children have difficulty with the English language because the Native language is the predominant language in the community. The elementary and secondary school district in the public school system has a high concentration of children from low-income families with each district considered an attendance area with no comparability considerations. Under the Title I funding, the school districts were expending an acceptable percentage of their total budget for instructional salaries and materials.

The team noted that those children enrolled in the remedial mathematics and reading programs were withdrawn from their regular mathematics and reading classes. This seems to supplant, not supplement, the regular program.

Title IV

The public school system implemented a program to provide for Indian home-school coordinators and instructional aides to assist in reading, mathematics and general curriculum instruction programs. The school district's Title I program provided for programs in the same areas of basic mathematics and reading skills programs.

Accordingly, in certain areas the Title IV program supplements through providing instructional aides for the existing Title I programs. The evaluation of the effectiveness of this program is difficult due to the interrelationships of this program with other existing federal programs. Approximately 83 percent of the Title IV money was directed to instructional and program administrative salaries, with only approximately two percent allocated for indirect charges.

Johnson-O'Malley

The BIA has contracted with the State Office of Public Instruction to administer the Johnson-O'Malley money in terms of approving applications for LEA funding. Projects funded under Johnson-O'Malley (at LEA 9) include an elementary science project, high school project, pre-kindergarten readiness program, music program and arts and communications project. It is the feeling of local administrators that funding under this program has been most useful.

Indian students involved in the arts and communications program have won national awards as part of their efforts, further improving self-image, student attitudes and verbal and non-verbal performance. Basically, the funds provided under Johnson-O'Malley are directed toward consumable supplies and instructional salaries.

P.L. 874

Survey sheets to identify students eligible for determination of P.L. 874 funding are sent to parents for com-

pletion and are returned for review and correction. Principals submit information for the computation of average daily attendance. Computations of eligibility for P.L. 874 are subsequently audited on an annual basis. Based on a review of the date of receipt of P.L. 874 funds, it is apparent that the local school district must have adequate resources available to meet its operating needs because revenues under P.L. 874 are not received until late in the school year.

LEA 10

Title I

As with most other Title I projects, these are generally directed toward grades kindergarten through sixth grade, where the program is most effective. The necessary accounting and administrative procedures under Title I funding appear to require excessive clerical effort. The school district accounting requirements are further complicated because the reporting periods for the Title I program are different from those of the state and the school district.

The fiscal year end of the Title I program is August 31, whereas that of the state and school district is June 30. Accordingly, financial reporting for the school district and state includes expenditures for two months of the prior year's program and ten months of the current year's program in reporting total federal program expenditures. Here is an example of the impact of failing to close out the prior year's programs and transfer remaining fund balances to the current year: The audit of Title I funds for June 30, 1973, reported 15 separate projects requiring recertification and reporting. Thus, maintaining a continuing up-date of carry-over funds available on a state and local level causes untenable and unnecessary clerical complications.

Title IV

Title IV funding is directed toward the various needs of the Indian student, generally in the areas of remedial reading, home-school coordinators, music, athletic programs, etc. State support for education does not generally provide for art, music or athletic programs, or for guidance counselors and principals, unless the school is large enough to provide personnel in these capacities. Accordingly, Title IV money is directed to these programs where needed, even if they would generally be considered basic support programs in school districts in other states.

In addition, existing regulations do not currently provide for financial budgeting to the degree required by other federal programs reviewed. Accordingly, financial budgets were generally not provided for either the Title IV application or subsequent accounting records. Budgeting was generally limited to allocating funds to the various schools based on Indian attendance, with an unallocated percentage remaining for administrative costs.

Johnson-O'Malley and P.L. 874.

This LEA did not receive funding under Johnson-O'Malley or P.L. 874.

Title I

Five schools were selected as target areas eligible for Title I participation. Based upon the evaluation summary conducted at the end of the school year, it is evident that Title I projects are responsible for progress of educationally deprived children (See Schedule 1).

The following is a cost breakdown by expense classification:

Administration	$ 6,551.60	6.95 percent
Instruction	77,034.12	81.76
Fixed Charges	8,600.00	9.13
Indirect Costs	2,036.28	2.16
Total	$94,222.00	100.00 percent

Considering that Indian students comprise 34 percent of the 2,859 students enrolled at the LEA, the team felt that the Title I programs are not receiving enough funds to meet the needs of the educationally deprived Indian students. No problems on comparability were evident within the geographical area of the LEA. LEA expenditures sample-tested on-site had adequate documentation.

Title IV

Apparently the administrators were misinformed about the specifics of the Act and its relationship to the Johnson-O'Malley program. For example, the Title IV application states: "In compliance with the State Department of Education, Indian Education Division, and Johnson-O'Malley federal

SCHEDULE 1

LEA 11 Public Schools
Title I of P.L. 89-10
Annual Evaluation 1973-74

Remedial Reading Grade Level	No. of Partic.	Test Results Pre-test (mean)	Post-test (mean)	Amt. of Gain (mean)
1	39	-0-	1.7	1.7
2	32	1.5	1.9	.4
3	44	2.2	2.8	.6
4	47	2.8	3.4	.6
5	54	3.4	4.1	.7
6	45	4.3	5.0	.7
7	17	4.5	5.6	1.1
8	27	5.4	7.4	2.0
9	23	5.9	6.9	1.0
10	30	6.2	7.1	.9
11	26	7.3	8.3	1.0
12	11	7.0	7.0	0
	395			

Remedial Reading
Component Expenditures: $52,560.88
Per Pupil Expenditures: $ 133.06

Remedial Language Arts Grade Level	No. of Partic.	Test Results Pre-test (mean)	Post-test (mean)	Amt. of Gain (mean)
2	12	1.5	2.4	.9
9	57	See Chart II		
10	38	6.3	6.8	.5
11	39	7.0	7.7	.7
12	19	7.3	8.5	1.2
	165			

Remedial Language Arts
Component Expenditures: $32,915.66
Per Pupil Expenditures: $ 199.48

Project Component	Type of Test Used	Name	Pre-test Form #	Post-test Form #
Remedial Reading	Standardized	Calif., Reading Ach.,-SRA	x	x
		Gates McGinitie-Metro. Readiness	1	2
Remedial Language Arts	Standardized	Gates McGinitie	1	2
		Calif.,Lang., Achievement ITED	x	y
Remedial Math	Standardized	SRA Achievement	x	y
		Calif., Math Achievement, 1	x	y
Remedial Science	Standardized	Gates	1	2
		Calif., Related Science	AA	BB

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SCHEDULE 1 (cont'd)

LEA 11 Public Schools
Title I of P.L. 89-10
Annual Evaluation 1973-74

Remedial Math Grade Level	No. of Partic.	Test Results Pre-test (mean)	Post-test (mean)	Amt. of Gain (mean)
2	12	See Chart III		
3	14	2.0	2.8	.8
4	25	3.0	3.6	.6
5	25	3.7	4.1	.4
6	24	3.8	4.4	.6
9	17	7.5	7.7	.2
10	4	8.9	9.9	1.0
11	1	9.7	9.8	.1
12	4	8.5	10.0	1.5
	126			

Remedial Science Grade Level	No. of Partic.	Test Results Pre-test (mean)	Post-test (mean)	Amt. of Gain (mean)
10	14			
11	4	See Chart IV		
12	5			
	23			

Remedial Math
Component Expenditures: $15,610.39
Per pupil Expenditures: $ 123.89

Remedial Science
Component Expenditures: $ 5,106.07
Per pupil Expenditures: $ 222.00

Ethnic Composition of LEA:

Race	No. of Students	%
Black	46	1.61
Asian American	4	.14
Spanish Surnamed American	5	.17
Caucasian	1833	64.11
American Indian	971	33.97
Total Students	2859	100.00%

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aid regulations, a public election was held April 3, 1973."

The superintendent said that the membership of Johnson-O'Malley Parent Advisory Board was identical to that of the Title IV Parent Advisory Board. The team could not determine by examining available documents whether or not a public hearing was held in compliance with applicable rules and regulations.

The funded projects were consolidated with the on-going school curriculum activities. In the arts and crafts component two additional staff members were employed as instructors to supplement the program. Equipment and material were included for all three local elementary schools in LEA 11. At the senior high level a vocational masonry class was supplied with materials for the entire year.

During the month of March, 1974, the budget was revised to acquire $11,450 worth of additional equipment for the masonry class, which included a cement-mixing truck. In the original application, a statement was made that the local board of education had begun construction on a facility to house a masonry training program. Because the vehicle did not arrive until the day before the team arrived on-site in July, the truck did not benefit the period for which funds were granted. The team also concluded that the use of Title IV funds under the above circumstances would not exclude non-Indians from classes that are established, maintained, operated and specifically designed to meet the special educational needs of Indian children.

Johnson-O'Malley

Again, documents showed cross-funding between Title IV and Johnson-O'Malley on various components and positions. Here is a breakdown of program costs, students and assignments. (See chart at end of site).

Parental costs (financed from carry-over funds from 1973) represented a total of 16.21 percent of available funds to the LEA.

It is evident from the above schedule that a major portion of Johnson-O'Malley funds are allocated to basic support functions within the school districts. This would not violate the state plan which stipulates that Johnson-O'Malley funds can supplement but not supplant local and state funds. The team did not come across any documents supporting a needs assessment by the local school administrator and the PAC for Johnson-O'Malley.

In addition, the state plan for the administration of Johnson-O'Malley funds calls for a documented analysis of the district's financial needs when an LEA has a general fund surplus in excess of 10 percent of the operating budget before a program can be funded. But the team could not find such a plan on file at the LEA. Our calculation was as follows:

Analysis of the General Fund Surplus per Audit Report for the year ended June 30, 1973	$195,607
10 percent of General Fund Accounts from 7/1/72 to 6/30/73	$145,314

Amount in Excess of 10%	$ 50,293

Composition of Surplus June 30, 1973

Cash	$ 30,606.94
Investments	165,000.00
Total	$195,606.94

The team concluded that the State Department of Education has not been monitoring, evaluating or enforcing the state Johnson-O'Malley plan as effectively as they should. Based on the above calculations, the team questioned the criteria for distribution of Johnson-O'Malley funds.

P.L. 874

The funds available under this act amount to 17.43 percent of federal funds and 3.0 percent of the general operating budget. Records were available to substantiate eligibility of pupils and were properly documented in accordance with the provision of the appropriate School Assistance in Federal Areas bulletin. Pupil-parent survey forms and procedures being used to substantiate eligibility for the current year's application were adequate. The last federal review of P.L. 874 funds was conducted on August 10, 1974, for the fiscal year ended June 30, 1971. No federal examination was conducted from that time to the on-site visit.

LEA 11

JOHNSON-O'MALLEY PERCENTAGES

Activity/Classes	Grade Level Assigned	Percent of Indian Students Receiving Services	Percent of Funds From Johnson-O'Malley Toward Total Cost of Program
Senior High Guidance Counselor	10-12	17.65	85.05
Arts and Crafts	7-9	27.54	80.39
Vocational Masonry	10-12	50.00	22.27
Elementary Guidance Counselor	K-6	22.69	83.95
Elementary Material Center Aide	K-6	19.77	45.84
Elementary Material Center Aide	K-6	14.58	14.24
Individualized Study/ Medic Center Aide	7-9	21.93	23.46
Junior High Guidance Counselor	7-9	21.93	85.46

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Title I

Funds available under this act provided approximately 38 percent of the five million federal dollars coming into this LEA. This represents the largest program funded by the federal government in the LEA and it probably has the greatest influence in terms of financial impact. Approximately 31 out of 74 elementary schools, nine out of 21 junior high schools and four out of ten senior high schools were eligible attendance areas. The estimated number of children who were participating in Title I projects at eligible attendance areas was 3,115 out of 66,211 students. No comparability problems were evident upon examination and inspection of records.

The following is a cost breakdown of expense classification:

Administration	5.05 percent
Instruction	82.89
Operation of Plant	0.11
Maintenance of Plant	0.62
Fixed Charges	10.45
Equipment	0.88
Total	100.00 percent

The main emphasis of the project components was on communication skills, remedial reading, math, special education and instructional aides. From available data and documents, the team found 46.50 percent of the Indian students were being served by Title I programs in eligible attendance areas in

LEA 12 - PERCENTAGE OF INDIAN STUDENTS SERVED BY TITLE I

	Elementary Schools	Junior High	Senior High	Total
Total Indian Students	1,335	794	525	2,654
Indian Students Eligible for Title I Participation	716	373	145	1,234
Percentage Served by Title I Projects	54	47	28	46.5

the LEA. It was also found that the Indian students represented only 3.7 percent out of a 20.1 percent minority student total in the LEA. It is evident in the Title I projects that the majority of Indian students were not being served by the funds available.

Title IV

The program's coordinated effort between the LEA and a Title IV - Part B grantee is providing counseling services to Indian students during school hours and after school. Other projects involved a comprehensive cultural awareness program through the school district.

The parents have taken an active part in terms of input and objectives for the Title IV program. The parents' and students' comments concerning services received from Title IV projects bear out the observations in the following paragraph.

Title IV funds represent only 3.52 percent of federal monies available to the LEA. But they have provided Indian students and parents a beginning in attempting to change the attitudes of non-Indians towards the education process of Indians. It is taking a coordinated effort of the community, Indian parents and students who are deeply involved and committed. The team observed that this is one of the few urban areas which has developed an overall model and delivery system in meeting the special needs of Indian students in an urban area.

Johnson-O'Malley

Although the LEA did not qualify for any funds from the Johnson-O'Malley program, the program administrators feel the state plan is not flexible enough to permit urban LEA's to supplement an existing educational need. The team concurred with the above discussion in this particular LEA. Although the LEA was not eligible according to the requirements of the state plan, a distribution formula should be developed to meet "educational problems under extraordinary or exceptional circumstances."

P.L. 874

Funds did not constitute any significant portion of the total federal funds received by the LEA. Out of this total an even more insignificant amount had any connection with American Indian students. For example, out of 3,216 student claims filed, only eight were students whose parents were employed on federal properties for 1973-74. This was the nearby Indian Hospital. Documentation of claims was more than adequate, as were the required pupil survey procedures.

LEA's 13 AND 14

Title I

At both locations, Title I funds were reviewed. At both locations the PAC decided remedial reading and math were the areas to be covered by Title I program projects. Both school districts were confronted with the problem of timing of Title I funds. The administration received their funding level sometime in August. This made hiring of teachers difficult because most good teachers have already signed their teaching contracts prior to August. Another problem was the impractical guidelines as to the use of Title I personnel and both school districts found it difficult to meet these guidelines.

Under the regulations, LEA 14's computation of comparability resulted in some schools being excluded from funding. This resulted because Head Start Centers were located in remote areas on the reservation and had very few students. This appears to be an injustice since the children who are probably the most educationally deprived on the reservation are eliminated as a target area because they are not comparable. The regulations should provide for the entire area being designated a project area and therefore qualifying all schools in the district project area. Regulations can be provided to adequately prevent large numbers of small centers from springing up on the reservation by setting up transportation criteria.

Findings of the Title I fiscal review at these sites in-

dicate the following problem areas:

- Existing regulations 116.17(c), (d), (e) regarding school attendance areas deprive Indian children of Title I benefits because their area cannot be designated a target area.
- Funding levels are not known in time to obtain qualified staff.

Title IV

In LEA 14, Title IV money approximated $119,000. The description of the project was "A Career Pre-Vocational Program, for junior high students and instructional aides for kindergarten classes on the (name of Tribe) Indian Reservation." The application provided $20,000 to be expended on equipment, $9,700 on supplies and $28,000 on construction, along with budget categories to fund instructional aides for kindergarten classes.

Of the $28,000 for construction, a substantial portion was used to complete the interior of a basic structure which was approved and funded by the school board. These expenditures are not made within the rules and regulations as effected July 6, 1973. The regulations specifically indicate under the definition of "minor remodeling" that the term does not include structural alterations to buildings, building construction, maintenance or repair. The remainder of the project appeared to be within the scope of the rules and regulations.

In LEA 13, Title IV money approximated $101,000. The description of the project was to "Provide training to

teachers in new educational methods." Of this amount, approximately $70,000 was expended for teacher stipends to attend workshops on new educational methods, testing and training materials, and on-site contracted services to assist classroom teachers and administrators in new methods.

Findings in this review would indicate the following:

- The training in this project included Indian and non-Indian teachers working in both BIA and public schools. The regulations do not specifically exclude or include teachers as recipients to benefits as outlined in Title IV regulations. The purpose of Title IV is developing and carrying out elementary and secondary school programs specifically designed to meet the special needs of Indian students. There would be some question as to whether training teachers in new methods meets "current expenditures" criteria in the regulations.

- Training stipends were being paid to BIA teachers in the form of tuition payments at a nearby college.

Two apparent conclusions can be drawn from site visitations regarding Title IV projects funded on reservations:

- Title IV funding on reservations having a high concentration of Indian students provides money which other programs already or should already provide under other programs.

- The definition of "special needs" in the regulations is so broad as to provide complete local discretion on expenditures of funds and project direction resulting in overlapping federal programs and possible duplication of resources.

Johnson-O'Malley

After completing an on-site review at the above indicated locations, the team ascertained the following fiscal assessments. In this state, all funds are administered by Tribal Organization #1 (funds approximated $1,530,000). Of this amount, both sites received in excess of $100,000 each. Both school administrations indicated that they had experienced difficulty in working with the Tribal organization in administering Johnson-O'Malley funds.

In both counties, the school administration said that Johnson-O'Malley administrators were trying to place undue restrictions, rules and regulations on the school administration in implementing contracts. In the case of LEA 14, the Tribal organization's state plan policies questioned the needs of the LEA to qualify for Johnson-O'Malley money, since it had carried over approximately one million dollars to the new fiscal school year. The Tribal organization felt that if the school district had an excess of $1 million, the special needs of Indian children should be provided out of such excess. In addition, the Indian group felt that the excess was in fact generated by the presence of Indian children in the district through P.L. 874 funds. Indian children made up 76 percent of the student population at this site. The school administration felt that the Johnson-O'Malley administration should not attempt to control the budgeting and fiscal management of the school district while providing approximately seven percent of

the total resources.

In LEA 13, the same opinion was held. In addition, it was felt that the major difficulty with Johnson-O'Malley funds was the significant amount of record keeping and report preparation necessary to satisfy the requirements of the Tribal organization.

An interesting observation can be made from LEA 13 as it relates to the distribution formula as mandated by the study. Through provisions provided in a cooperative agreement with the BIA, LEA 13 provides instructors in BIA facilities within the county. The BIA provides other services and facilities to the public school system. This cost of instruction is included in the county budget under the instruction category. However, in computing the per pupil cost for the county school district, students in the BIA facility are not included in the number of students being served by the school system. It would not be possible to obtain an accurate per pupil expenditure as long as this circumstance exists or an exchange of cost data does not take place.

An audit was performed by the Office of Audit and Investigation, Department of the Interior, on contracts awarded to the Tribal organization by the BIA for the two-year period ended June 30, 1973. The auditors took exception to approximately 62.5 percent of all Johnson-O'Malley funds administered by the Tribal organization. The following table represents a percentage breakdown of the various

categories for questioning the costs of Johnson-O'Malley expenditures.

Reasons for Audit Exception	Percentages
Ineligible student participation	5.26
Basic support need not justified	63.27
Basic support classified as special programs	13.29
Budget variance	8.73
Lack of supporting documents	5.10
Carry-over balances	4.35
Total	100.00

After a thorough analysis of the above questioned costs in the audit, the team felt that the majority of the audit exceptions could have been avoided if:

- The BIA Area Office had been more specific in contract definitions. (For example, the difference between Basic Support and Special Programs, eligible participants to include college students, etc.)

- If the BIA had established accounting standards and provided adequate financial monitoring of the contract activities. (For example, accounting system certifications before funds are released to contractors, an unqualified audit certification from independent public accounts of funds expended, etc.)

- If the contracting personnel and program personnel in the BIA were to clearly communicate and coordinate their intentions to the contractor. If this does not take place, conflict and confusion develop between the contractor and the financial auditors, with both of them attempting to interpret ambiguous contract language and discharge their responsibilities.

P.L. 874

Based upon site visitations, P.L. 874 funds as determined by state calculations fail to take into consideration relevant cost factors experienced by the two large reservations. By using the comparable district concept these school systems are penalized by having their particular needs reduced in the averaging process. The amount of funds received provides a major portion of basic operation and maintenance support. The impact of these funds in operational terms is necessary in both school districts to ensure that Indian children receive a basic education.

LEA 15

Title I

This site was funded for ESEA Title I and Title IV, Part A under an application process called "CONSOLAP". This was the only state visited that used the consolidated application process for all federal funds that were being channeled through the SEA down to the LEA.

Under the above concept, all LEAs use one application to apply for refunding on a year-to-year basis. In theory this should cut down on a tremendous amount of paper work at the LEA and SEA. A uniform coding system for identification of target population, funding source, needs assessment is a major feature of the application process. Title IV was not included in the above application since the SEA did not administer any funds received by the LEA. P.L. 874 was not included because of the nature of such funds.

The main components funded under Title I included counseling services for grades K-12, resource rooms for elementary and junior high, remedial math and reading for senior high, summer recreation and the administration component.

One exception was the duplication of effort in accounting system procedures for Title I expenditures. Although the Title I program contributes to a centralized accounting system operated by the school district, a manual set is kept

by the director of federal projects personally for reporting purposes to the SEA and federal government. One justification in the administration component calls for a secretary-bookkeeper and a fiscal clerk to perform the above duties. The team thought that the director's time could be put to more efficient and effective functions in the administration of the Title I program.

The records, files and documents were examined and verfified for compliance with Title I rules and regulations in comparability requirements, eligibility documents for program participants, expenditures for Title I program personnel and material, and inventory requirements. No problems or audit exceptions were discovered in the performance of the above items.

Title IV

The two projects funded under the Act included a vocational and cultural awareness class directed at Indian students in the intermediate grades. The second component included a pre-school class with parental involvement to improve the child's communcation skills. Although the program did not get started until November, 1973, there was not any deviation from the original application submitted to the OE. Expenditures amounting to 20 percent of the approved budget were examined in detail for documentation and compliance with Title IV rules and regulations.

No violations or exceptions were discovered upon com-

pletion of the examination. The local administrators felt that in order for the Title IV program to be more effective, additional funds would have to be given to the LEA.

A breakdown of the Title IV budget is as follows:

Category	Amount	Percentage
Personnel costs	$34,334	59.46
Travel	1,750	3.03
Equipment	3,000	5.20
Supplies	8,263	14.31
Contract savings	8,115	14.06
Construction	1,500	2.60
Other	772	1.34
	$57,734	100.00

Johnson-O'Malley

A program for $38,759 was approved for the 1973-74 school year. The LEA was funded to provide supportive services such as counseling services, an elementary resource room and a cultural enrichment class for Indian students.

The amount provided was not enough to fund any single component but was used as a supplement to the Title I and Title IV programs. For example, the counseling services were provided with funds from Title I and Johnson-O'Malley; the elementary resource rooms were funded from Title I, Title I-Migrant and Johnson-O'Malley; the arts and crafts component was funded by Title IV and Johnson-O'Malley. Approximately 22 percent of the budget expenditure was examined for compliance with applicable Johnson-O'Malley rules and re-

gulations. No violations were found among the expenditures. The only exception we found at the LEA related to the distribution of funds in the state Johnson-O'Malley plan of operation.

P.L. 874

This program was probably the most scrutinized of the four involved in the study at this site. This team found no discrepancies among the records verifying claims submitted on the application and was astonished that this LEA had been subject to audit by federal officials for the past 15 years with no major audit exceptions!

The team concluded that, for an LEA of this size, the accountability and stewardship for federal funds has been exemplary in the discharge of responsibility. The P.L. 874 funds represented 27.9 percent of all federal and 5.5 percent of the total operating budget. Final conclusions are:

- The amount of federal funds from P.L. 874 has no relationship to the percentage of Indian students (22 percent) in the school district.
- Factors creating this situation could not be isolated for study.

APPENDIX III

B. FISCAL COMPLIANCE RATINGS

The following compliance ratings were done by the four accountants who comprised the fiscal study team. Each accountant did the ratings for the sites he visited. In the cases where two or more of the accountants visited one site, the ratings were done cooperatively.

Part 1 of the ratings is based on generally accepted auditing procedures, and Part 2 is based on the rules and regulations of the laws being considered. The rating scale is as follows:

Rating Scale:

4 = Superior and/or Exemplary
3 = More than Adequate
2 = Adequate
1 = Inadequate
0 = Non-applicable

1.) Accounting System and Procedures.

(a) Adequacy of accounting system

(b) Accounting personnel and staff

(c) Compliance with applicable State law

(d) Annual audit compliance

(e) Adequacy of accounting system for CPIR data

LEA

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
(a)	2	2	2	3	2	2	2	4	2	2	2	3	3	3	2
(b)	3	2	3	3	2	3	2	3	2	2	2	2	3	2	1
(c)	2	2	3	3	2	3	2	3	2	2	2	2	2	2	4
(d)	3	1	1	1	2	2	1	3	2	2	2	2	3	3	1
(e)	1	1	1	1	1	1	1	4	1	1	1	1	1	1	1

2.) Program Compliance with Applicable Federal Rules and Regulations

TITLE I

(a) Geographical targeting of attendance areas

(b) Documentation of eligibility criteria

(c) Comparability requirements

(d) Objectives of proposed applications adequate in view of other Federal programs

(e) Identification of students for project participation

(f) Involvement of teachers, parents, school adm. in needs assessment

(g) Adequacy of physical facilities

(h) Examination of expenditures:
- (1) -Expended in accordance with approved budget
- (2) -Expended in accordance to Title I rules & regulations
- (3) -Financial reporting requirements

(i) Examination of revenues:
- (1) -Receipt of funds on a timely basis by LEA
- (2) -Approval of applications by the SEA on a timely basis

(j) Adequacy of LEA evaluation methods

(k) Overall evaluation of program success in meeting the educational needs of Indian children from low income families.

L E A

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
(a)	2	2	2	2	2	3	2	4	2	2	3	3	2	2	2
(b)	1	2	2	2	4	2	2	4	2	2	1	2	2	2	1
(c)	1	1	0	2	2	2	0	4	0	1	0	2	2	2	2
(d)	3	2	3	3	2	2	2	4	2	2	2	3	1	2	3
(e)	2	3	3	3	2	4	2	2	2	2	1	4	2	3	4
(f)	1	1	2	2	1	1	2	1	2	1	1	2	2	2	1
(g)	3	1	1	3	1	2	2	2	2	2	1	3	2	2	1
(h) (1)	2	1	2	2	2	2	2	2	2	2	2	2	2	2	2
(h) (2)	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
(h) (3)	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
(i) (1)	2	3	2	2	1	2	2	2	2	2	2	2	2	2	2
(i) (2)	1	1	2	2	1	1	2	2	2	2	1	2	2	2	1
(j)	2	1	2	2	2	2	2	3	3	2	2	2	1	2	2
(k)	3	1	2	2	3	2	3	3	3	2	2	2	3	3	3

2.) Program Compliance (cont'd)

JOHNSON O'MALLEY

(a) Eligible participation in programs and projects funded

(b) Local tax effort a factor in the LEA applying for JOM funds

(c) Adequate state aid available to LEA before submitting application for JOM funds

(d) Adequacy of P.L. 874 funding prior to receiving JOM funds

(e) Distribution formula is understood by LEA administrator

(f) LEA administrators satisfied with receipt of JOM funds on a timely basis

(g) LEA administrators satisfied with current BIA contracting policies

(h) Funds expended and documented in accordance with existing rules and regulations.

(i) Funds expended or utilized in a special project and/or supplemental manner

(j) Funds expended or utilized in a basic support manner for the LEA

(k) Impact of JOM funds within the LEA in providing unmet financial needs and/or meeting educational problems under extraordinary or exceptional circumstances

LEA

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
(a)	0	1	4	4	2	4	2	0	2	0	1	0	2	2	4
(b)	0	2	4	4	3	2	2	0	2	0	1	0	2	2	2
(c)	0	1	1	1	2	2	1	0	1	0	2	0	1	1	1
(d)	0	2	1	1	2	2	2	0	3	0	2	0	3	3	2
(e)	0	1	1	1	1	1	1	0	1	0	2	0	1	1	1
(f)	0	1	1	1	1	1	1	0	1	0	2	0	1	1	2
(g)	0	1	1	1	1	1	1	0	1	0	2	0	1	1	1
(h)	0	1	1	1	1	2	1	0	1	0	1	0	2	2	2
(i)	0	2	0	0	1	1	1	0	1	0	0	0	2	2	1
(j)	0	0	4	4	2	0	0	0	0	0	3	0	0	0	1
(k)	0	0	1	1	1	2	1	0	1	0	3	0	1	1	2

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2.) Program Compliance (cont'd)

TITLE IV - INDIAN EDUCATION ACT

(a) Appropriate public hearings held by LEA prior to submission of application

(b) Selection of parent committee within Title IV regulations

(c) Needs assessment is based on the input of parents, teachers, students

(d) Funds expended in accordance with approved budget

(e) Funds expended in accordance with Title IV regulations and rules

(f) Combined fiscal effort requirement adhered to by LEA

(g) Financial reporting requirements as to the expenditure of Title IV funds

(h) Evaluation methods adequate

(i) Overall evaluation of program success in meeting the special educational needs of Indian children within the LEA

L E A

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
(a)	2	2	2	2	2	2	2	3	2	2	2	2	2	2	2
(b)	2	2	2	2	2	2	2	2	2	2	1	2	2	2	2
(c)	3	2	1	1	1	1	1	2	2	2	1	2	1	2	2
(d)	2	2	2	3	1	2	2	2	2	2	2	2	2	2	3
(e)	1	2	2	4	1	1	2	2	2	1	1	2	1	2	3
(f)	2	1	1	1	2	2	1	1	1	1	2	1	1	1	3
(g)	2	1	3	3	2	2	2	4	2	2	2	2	2	2	3
(h)	3	1	3	4	1	2	1	1	1	1	1	3	1	1	2
(i)	3	1	3	3	2	1	1	1	1	2	1	3	1	1	1

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2.) Program Compliance (cont'd)

PUBLIC LAW 874

(a) Documentation of eligible students submitted on LEA application

(b) Understanding of the rate calculation by LEA administrator responsible for submission of application

(c) Reduction of state aid to LEA evident or documented

(d) Increase of state aid to LEA evident or documented

(e) LEA administrator's view of the 874 program in comparison to the above-mentioned three: Title I, JOM, Title IV.

(f) Impact of the 874 program on the total LEA operating budget in providing a basic educational program for Indian children

LEA

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
(a)	3	4	3	3	2	2	3	2	3	2	3	0	2	2	4
(b)	3	4	1	1	2	2	1	2	1	2	2	0	2	2	2
(c)	2	1	1	1	1	2	2	0	2	0	2	0	2	2	2
(d)	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0
(e)	3	4	4	4	2	4	3	4	4	3	3	0	3	4	2
(f)	2	4	1	1	2	2	4	2	4	3	2	0	3	3	2

APPENDIX III

C. FISCAL CHARTS

CHART 1- Revenue By Source By Site

CHART 2- Schedule of Federally Sponsored Programs

CHART 3- Expenditures By Function By Site

Note: On the following charts, LEA 4 is divided into 4 (high school) and 4A (elementary school) because of the LEA's accounting procedures and because of joint ventures with the BIA.

CHART 1

USOE/NIA STUDY
REVENUE BY SOURCE BY SITE
72-73 BUDGET YEAR

	Site 1	Site 2	Site 3	Site 4	Site 4A	Site 5	Site 6	Site 7
Local, state, county & tuition	$48,309,100	$11,916,500	$416,000	$461,300	$ 996,500	$ 8,500,300	$3,558,000	$3,870,400
Percentage	95.6%	33.2%	47.3%	58.0%	54.0%	61.9%	90.3%	72.6%
Cost per pupil	$ 1,482	$ 616	$ 567	$ 934	$ 680	$ 586	$ 734	$ 707
P.L. 874	1,707,300	22,718,700	294,000	155,200	458,100	3,805,100	231,300	1,043,200
Percentage	3.4%	63.3%	33.5%	19.5%	24.0%	20.3%	5.9%	19.6%
Cost per pupil	$ 52	$ 1,175	$ 400	$ 314	$ 313	$ 268	$ 48	$ 191
JOM - Basic Support	- 0 -	- 0 -	171,500	179,000	392,100	- 0 -	124,600	- 0 -
Percentage			19.4%	22.5%	21.2%		3.2%	
Cost per pupil			$ 233	$ 362	$ 268		$ 26	
** Other federal & miscellaneous	521,900	1,267,700				1,344,279	24,395	414,400
Percentage	1.0%	3.5%	- 0 -	- 0 -	- 0 -	9.0%	.6%	7.8%
Cost per pupil	$ 16	$ 66				$ 92	$ 4	$ 75
* Total general budget	$50,538,300	$35,902,900	$882,300	$795,500	$1,846,700	$13,729,679	$3,938,295	$5,320,000
Percentage	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Revenue per pupil	$ 1,550	$ 1,857	$ 1,200	$ 1,610	$ 1261	$ 946	$ 812	$ 973
Average daily membership	32,596	19,334	735	494	1,465	14,508	4,850	5,475
Percent of general operating fund:								
ESEA Title I	0.73%	4.27%	10.3%	-	8.21%	5.22%	3.66%	9.71%
Indian Education Act - Title IV	0.69%	2.27%	8.56%	-	7.85%	4.65	1.79%	5.86%

* Note: Cash balance carryovers are not included in the above revenue figures. Most states require that carryovers be considered sources of revenue for next budget year.

** Note: All other federal and miscellaneous revenue does not include ESEA Title I and Indian Education Act - Title IV funding.

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CHART 1 (cont.)

USOE/BIA STUDY
REVENUE BY SOURCE BY SITE
72-73 BUDGET YEAR

	Site 8	Site 9	Site 10	Site 11	Site 12	Site 13	Site 14	Site 15
Local, state, county & tuition	$70,711,100	$1,363,200	$8,436,100	$1,450,400	$43,524,500	$527,200	$786,600	$2,294,700
Percentage	95.2%	75.7%	99.7%	93.0%	97.3%	35.2%	40.6%	89.4%
Cost per pupil	$ 1,202	$ 787	$ 659	$ 540	$ 692	$ 367	$ 470	$ 771
P.L. 874	454,300	331,100	- 0 -	43,600	519,500	897,900	651,400	116,100
Percentage	.6%	18.4%		2.8%	1.2%	59.9%	33.8%	4.5%
Cost per pupil	$ 8	$ 191		$ 16	$ 8	$ 626	$ 389	$ 39
JOM	- 0 -	- 0 -	- 0 -	- 0 -	- 0 -	- 0 -	43,000	- 0 -
Percentage							2.2%	
Cost per pupil							$ 26	
Other federal & miscellaneous	3,137,448	106,685	26,250	65,219	648,001	74,400	484,381	154,539
Percentage	4.2%	5.9%	.3%	4.2%	1.5%	4.9%	25.1%	6.1%
Cost per pupil	$ 53	$ 61	$ 2	$ 34	$ 11	$ 52	$ 279	$ 52
Total general budget	74,302,848	1,800,985	8,462,350	1,559,219	44,692,001	1,499,500	1,965,381	2,565,378
Percentage	110.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Revenue per pupil	$ 1,263	$ 1,039	$ 662	$ 580	$ 711	$ 1,045	$ 1,174	$ 862
Average Daily membership	58,833	1,733	12,795	2,687	62,907	1,435	1,675	2,975
Percent of general operating fund:								
ESEA Title I	3.91%	3.20%	20.34%	8.47%	3.85%	18.08%	10.64%	6.16%
Indian Education Act - Title IV	.3%	2.79%	5.76	3.79%	.39%	6.74%	6.04%	8.25%

* Note: Cash balance carryovers are not included in the above revenue figures. Most states require that carryovers be considered sources of revenue for next budget year.

** Note: All other federal and miscellaneous revenue does not include ESEA Title I and Indian Education Act - Title IV funding.

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CHART 2

USOE/BIA STUDY
SCHEDULE OF FEDERALLY SPONSORED PROGRAMS
OFFESY SITES REVIEWED

	Site 1	Site 2	Site 3	Site 4	Site 4A	Site 5	Site 6	Site 7
Other Federally Funded Projects:								
JOM-Supplemental		400,000				1,042,700	9,900	407,400
Migrant farm workers children								
National defense education act								
Forest reserve income						3,744	1,200	
Follow through								
CAP programs								
Teacher Corp. program		101,074						
Drug education								
Driver education								
Adult Basic education								
Neighborhood youth corp.								
Carrier opportunities program		192,446						
Emergency employment act								
Preschool for hearing								
Manpower development								
Model city educational -								
Older American act								
Safe streets act								
Youth advocates corps								
U.S. Officer of education								
Social Security								
Flood Control								
Vocational projects		65,377				54,215	13,295	7,000
Exemplary vocation 72								
OEO-NE-CP453-72								
ROTC	55,213							
U.S. School lunch reimbursement	407,578							
Fixed lunch contributions	59,109							
Island schools		289,810						
Other special federal reserve								
Child nutrition		218,993				943,620		
Total Other federal programs	$ 521,900	$1,267,700	$ -	$ -	$ -	$1,344,279	$ 24,395	$ 414,400
ESEA Funds:								
Title I	$ 370,400	$1,531,000	$ 90,901	$ -	$151,598	$ 662,800	$ 143,800	$ 477,800
Title II							2,452	1,606
Title III		135,407				12,824		
Title IV								
Title VI		3,987						
Title VII								
Title VIII		187,000						
Title IX - from state		78,144						
Right to read & bilingual								
Total ESEA funds	370,400	1,935,538	90,901	-	151,598	675,624	146,252	479,406
Indian Education Act - Title IV	341,100	610,436	75,500		144,900	590,800	70,400	288,300
Average daily membership	32,596	19,334	735	494	1,465	14,504	4,652	5,475

CHART 2 (cont.)

USOE/BIA STUDY
SCHEDULE OF FEDERALLY SPONSORED PROGRAMS
OF TEST SITES REVIEWED
72-73 BUDGET YEAR

	Site 8	Site 9	Site 10	Site 11	Site 12	Site 13	Site 14	Site 15
Other Federally Funded Projects:								
JOM-Supplemental		55,700		32,000		74,400	36,400	44,000
Migrant farm workers children								96,483
National defense education act			6,250					2,427
Forest reserve income								
Follow through								
CAP programs	93,368						347,580	
Teacher Corp. program	94,448						49,816	
Drug education					11,312		30,016	
Driver education							1,904	
Adult basic education	413,216	5,572		11,711	54,014		10,795	
Neighborhood youth corp.	650,000				61,706			
Carrier opportunities program	260,000							
Emergency employment act	231,405	39,163	20,000	12,101	30,399			
Preschool for hearing	78,079							11,628
Manpower development	895,980							
Model city educational	185,000							
Older American act	26,820							
Safe streets act	47,000							
Youth advocates Corps	131,132							
U.S. Officer of education	25,000							
Social Security								
Flood control				4,737	159,734			
Vocational projects				3,870				
Exemplary vocation 72					281,180			
COE-MF-CP453-72					37,274			
ROTC					12,382			
U.S. School lunch reimbursement								
Fixed lunch contributions								
Island schools								
Other special federal reserve.								
Child nutrition								
Total other federal programs	$3,131,448	$100,435	$ 26,250	$ 65,219	$ 640,001	$ 74,400	$494,351	$154,038
ESEA Funds:								
TITLE I	$2,901,750	$ 57,600	$1,721,200	$132,058	$1,720,200	$ 271,137	$209,099	$158,063
TITLE II	91,302		20,000	4,593			2,600	7,553
Title III	797,600			319	5,303		1,276	394
Title IV	2,121,002							
Title VI	46,396		15,000		9,300		3,890	
TITLE VII								
Title VIII								
Title IX — from state		184,714						8,424
Right to read & bilingual		30,000						
Total ESEA funds	6,500,450	272,314	1,756,200	136,970	1,735,403	271,137	216,965	174,434
Indian Education Act - Title IV	234,800	50,149	487,500	59,105	176,300	101,100	118,800	57,300
Average daily membership	58,833	1,737	12,795	2,607	62,907	1,435	1,675	2,975

CHART 3 (cont.)

USOE/RMA STUDY
EXPENDITURES BY FUNCTION BY SITE
72-73 BUDGET YEAR

	Site 1	Site 2	Site 3	Site 4	Site 4	Site 5	Site 6	Site 7
Regular programs & tuition	$32,254,625	$21,532,913	$463,144	$412,418	$ 870,979	$ 7,766,361	$2,716,474	$3,445,130
Percentage	59.6%	56.7%	53.0%	53.7%	49.4%	43.9%	50.5%	44.0%
Per pupil cost	$ 991	$ 1,114	$ 631	$ 835	$ 595	$ 535	$ 560	$ 630
Pupil transportation	2,347,478	819,500	60,983	36,777	122,226	651,600	201,486	226,945
Percentage	4.3%	2.2%	7.0%	4.8%	6.9%	3.7%	4.3%	2.9%
Per pupil cost	$ 71	$ 43	$ 83	$ 75	$ 83	$ 45	$ 41	$ 42
Operation & Maintenance	2,467,790	6,967,606	70,330	54,176	188,279	11,609,913	483,909	654,868
Percentage	4.6%	18.3%	8.5%	7.0%	10.7%	9.6%	9.5%	8.4%
Per pupil cost	$ 76	$ 360	$ 96	$ 109	$ 129	$ 117	$ 91	$ 120
Subtotal	37,069,893	29,320,019	602,457	503,371	1,181,484	10,106,974	3,356,869	4,326,943
Percentage	69.5%	77.2%	68.5%	65.5%	67.0%	57.2%	72.3%	55.3%
Per pupil cost	$ 1,139	$ 1,517	$ 821	$ 1,019	$ 807	$ 697	$ 692	$ 792
Special program	2,898,004	4,912,720				2,446,827	521,346	1,096,402
Percentage	5.3%	12.9%				13.8%	11.2%	14.0%
Per pupil cost	$ 88	$ 253				$ 168	$ 107	$ 200
Supporting services-pupil & staff	544,192		29,270	56,158	54,649	337,908	88,773	145,830
Percentage	1.0%		3.3%	7.3%	3.1%	1.9%	1.9%	1.8%
Per pupil cost	$ 17		$ 39	$ 144	$ 37	$ 23	$ 18	$ 26
Supporting services-gen. & admin.	1,761,093	2,374,800	69,232	76,891	102,426	341,970	150,908	150,601
Percentage	3.2%	6.3%	7.9%	10.0%	5.8%	1.9%	3.3%	1.9%
Per pupil cost	$ 53	$ 124	$ 94	$ 156	$ 70	$ 23	$ 32	$ 27
Supporting services-food services	2,373,465	1,385,200		13,041	19,404	14,500	12,690	16,348
Percentage	4.4%	3.6%		1.7%	1.1%	.1%	.3%	.2%
Per pupil cost	$ 73	$ 71		$ 26	$ 13	$ 1	$ 3	$ 3
Supporting services-fixed charge	9,457,177		56,992	56,304	201,192	1,180,789	422,310	515,020
Percentage	17.4%		6.5%	7.3%	11.4%	6.7%	9.3%	6.6%
Per pupil cost	$ 289		$ 77	$ 114	$ 137	$ 82	$ 89	$ 94
Capital outlay & debt service			117,339	62,799	205,052	2,931,735	50,931	1,340,812
Percentage			13.4%	8.0%	11.6%	16.6%	1.1%	17.1%
Per pupil cost			$ 160	$ 128	$ 140	$ 202	$ 11	$ 245
Community educational services	93,571					320,624	27,214	245,493
Percentage	.2%					1.8%	.6%	3.1%
Per pupil cost	$ 3					$ 22	$ 6	$ 44
Total	$45,525,933	$37,992,739	$875,350	$769,564	$1,764,207	$17,681,367	$4,641,041	$7,837,536
Percentage	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Per pupil cost	$ 1,663	$ 1,965	$ 1,191	$ 1,556	$ 1,204	$ 1,219	$ 957	$ 1,432
Average daily membership	32,596	19,334	735	494	1,465	14,508	4,850	5,475

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CHART 3 (cont.)

USOE/BIA STUDY
EXPENDITURES BY FUNCTION BY SITE
72-73 BUDGET YEAR

	Site 8	Site 9	Site 10	Site 11	Site 12	Site 13	Site 14	Site 15
Regular programs & tuition	$41,156,808	$1,121,484	$ 5,092,227	$1,162,873	$32,619,109	$ 801,742	$1,031,290	$1,810,862
Percentage	52.7%	53.3%	54.9%	58.9%	71.6%	57.9%	54.3%	59.9%
Per pupil cost	$ 700	$ 548	$ 461	$ 432	$ 518	$ 601	$ 616	$ 608
Pupil transportation	468,692	112,157	818,311	141,607	537,182	92,928	86,497	205,467
Percentage	.6%	5.2%	7.6%	8.4%	1.2%	6.3%	4.6%	6.7%
Per pupil cost	$ 8	$ 53	$ 64	$ 53	$ 9	$ 65	$ 52	$ 69
Operation & Maintenance	8,973,890	175,447	946,366	176,400	5,707,379	151,777	237,704	314,942
Percentage	11.5%	8.3%	8.8%	10.5%	12.5%	10.2%	12.6%	10.3%
Per pupil cost	$ 153	$ 101	$ 74	$ 66	$ 90	$ 106	$ 143	$ 105
Subtotal	50,599,300	1,409,088	7,656,904	1,480,960	30,863,720	1,106,447	1,355,491	2,331,311
Percentage	64.9%	66.8%	71.3%	87.8%	85.3%	74.4%	71.5%	76.5%
Per pupil cost	$ 861	$ 812	$ 599	$ 551	$ 617	$ 772	$ 811	$ 782
Special programs	8,967,992	421,072		1,396	751,530	10,711	29,406	296,859
Percentage	11.5%	20.0%		.1%	1.7%	.7%	1.5%	9.8%
Per pupil cost	$ 153	$ 243		$ 1	$ 12	$ 7	$ 17	$ 100
Supporting services-pupils & staff	6,977,228	6,262	8,420	67,576	504,992	70,703	14,492	185,015
Percentage	8.9%	.3%	.1%	4.0%	1.1%	4.8%	.8%	6.1%
Per pupil cost	$ 118	$ 4	$ 1	$ 25	$ 8	$ 50	$ 9	$ 62
Supporting services - gen. & admin.	7,040.445	50,500	165,247	9,225	1,648,362	74,102	52,954	65,708
Percentage	9.0%	2.0%	1.5%	.5%	3.6%	4.9%	2.8%	2.2%
Per pupil cost	$ 119	$ 34	$ 13	$ 3	$ 26	$ 51	$ 32	$ 22
Supporting services - food services		121,536	991,000	104,902		30,699	25,000	163,785
Percentage		5.8%	9.2%	6.2%		2.1%	1.3%	5.4%
Per pupil cost		$ 70	$ 77	$ 39		$ 22	$ 14	$ 55
Supporting services - fixed charge		43,373	1,920,141	21,501	2,811,338	73,677	127,702	
Percentage		2.3%	17.9%	1.3%	6.2%	4.9%	6.7%	
Per pupil cost		$ 28	$ 77	$ 8	$ 45	$ 51	$ 76	
Capital outlay & debt service	3,553,596	30,925			443,347	122,874	293,870	
Percentage	4.5%	1.5%			1.0%	8.2%	15.4%	
Per pupil cost	$ 60	$ 18			$ 7	$ 85	$ 175	
Community educational services	1,019,612	9,850			502,834			
Percentage	1.3%	.5%			1.1%			
Per pupil cost	$ 17	$ 6			$ 8			
Total	$78,158,253	$2,105,606	$10,741,712	$1,686,507	$45,525,933	$1,489,213	$1,890,815	$3,042,268
Percentage	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Per pupil cost	$ 1,328	$ 1,215	$ 840	$ 628	$ 724	$ 1,038	$ 1,134	$ 1,023
Average daily membership	58,833	1,733	12,795	2,687	62,907	1,435	1,675	2,975

APPENDIX IV-A: SCALE CONTENT FOR PROGRAM QUESTIONNAIRES

TABLE A1: Educational Content Questionnaire

Scale	No. of Items	Item Content
PSUC	2	(For each program) Is the program successful? Are you satisfied with the program?
PREL	4	Are there texts dealing with Indians? Is there material dealing with local Indian history? Are bilingual courses available? Do teachers attend these courses?
TT/GEN	27	(Averaged across programs) Have teachers received training in: reading, English language arts, innovative teaching techniques, diagnosis of pupil problems, individualized instruction, use of equipment and materials, management techniques, dissemination techniques?
TT/IR	12	(Averaged across programs) Have teachers received training in: English as a second language, Native American culture, local Indian culture?
PEMSM	3	(For each program) which of the following areas is emphasized in your program: reading (English), math, vocational subjects?
PEMMI	2	(For each program) Which of the following areas are emphasized in your program: counseling, supportive services?
PEMIR	2	(For each program) Which of the following areas are emphasized in your program: Indian language, Indian history and culture?
PSFADM	3	(Averaged across programs) Is the following an important factor in program success: administrators?
PSFPAC	3	(Averaged across programs) Is the following an important factor in program success: Parent Advisory Council/Committee?

TABLE A1: EDCQ SCALES (cont'd.)

Scale	No. of Items	Item Content
PSFTCH	6	(Averaged across programs) Are the following important factors in program success: teachers, teacher aides?
PSFFAM	6	(Averaged across programs) Are the following important factors in program success: community aides, parents?

TABLE A2: Parent Advisory Committee Questionnaire

Scale	No. of Items	Item Content
KNOW	8	Items dealing with having a copy of the law, having a copy of the Federal regulations, etc., understanding the law, understanding the regulations, etc., having a copy of the program proposal, knowing the current budget, receiving copies of minutes of PAC meetings, and having a copy of the needs assessment.
T/GEN	3	Have you received (anv) training? How many days of training sessions? How helpful was the training?
ACT/PF	5	Does your committee participate in: making needs assessments, negotiating contracts, planning and developing programs, evaluating and monitoring programs, hearing complaints from Indian students and parents?
SCHINT	9	Items on whether the committee meets with: the school boards, the professional staff (in general), the superintendent, the principal, teachers, aides, and the program director. Also, one item on whether there is a good relationship between the principal and the committee.
CONTRL	3	Items on participation in staff hiring, final decision on staff hiring, and general control over the program.
PACINT	2	Items on whether the committee meets with the two other committees.
SELECT	3	Are committee members: elected by Indian community in general election (score 2), selected by Indian community at a meeting (score 2), appointed by Tribal Council (score 1). Maximum score is 5, good score is 2.
MEET	3	How often does your committee meet? How well-attended are the meetings? Do you receive copies of the minutes of the meetings?

TABLE A2: PACQ SCALES (cont'd.)

Scale	No. of Items	Item Content
PROPUB	2	Were advertised public hearings held? Did you attend them?
PROSUC	13	Is the program successful in your school (weighting factor of 6)? Have the following factors contributed to the success (12 items dealing with content, supportive services, staff, training, etc.)?
T/THEO	3	Have you had training in the following areas: understanding of laws, understanding of rules and regulations, role as a committee member?
T/PRAC	5	Have you had training in the following areas: program writing, needs assessment, planning, evaluation, educational practice?
COMINT	4	Does the committee disseminate information to the community by means of: home visits, newsletter, media, meetings?
T/NEED	8	In which of the following areas do you need training: understanding of laws, understanding of rules and regulations, role as a committee member, program writing, needs assessment, planning, evaluation, educational practice?
HIRING	3	What criteria are used in hiring program staff: education, experience, knowledge of Indian community.
EDSUC	1	Do you feel that the present educational program offers sufficient preparation for the future of Native American students?

TABLE A3: Business Community Questionnaire

Scale	No. of Items	Item Content
SCHINV	11	Have you been a candidate for election to the school board? Have you considered running for the school board? Can you name all the members of the school board? Are you or your spouse a member of the school board? Of the PTA? Have you attended school board meetings in the past year? PTA meetings? Do you offer recommendations to the school board? To the PTA? Do you visit the school(s)? Do you offer recommendations to the school administrators?
SPECP	4	Do you feel that teachers should be specially trained to teach Native American students? Do you think that special programs should be provided for Native American students because of language difficulties? Because of cultural differences? In general?

APPENDIX IV-B: SAMPLE DESCRIPTIONS

TABLE B1: EDCQ SAMPLE

	LEA*															
Role-Group	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Group Sample
1	3	7	0	5	8	2	0	3	8	4	3	3	8	3	4	61
2	2	1	7	3	12	5	3	1	1	6	0	6	4	1	0	52
3	1	2	3	1	23	6	17	8	10	1	0	19	10	4	5	110
4	4	2	3	6	12	1	14	3	1	0	14	7	3	1	10	81
5	0	0	0	5	15	0	0	0	0	0	8	0	3	0	0	31
Total LEA Sample	10	12	13	20	70	14	34	15	20	11	25	35	28	9	19	335

TABLE B2: TITLE I PACQ SAMPLE

	LEA															
Role-Group	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Group Sample
1	1	10	3	3	6	0	6	4	0	0	2	5	6	2	1	49
2	5	2	4	11	16	4	1	3	12	5	23	7	3	2	9	107
3	1	2	0	1	20	9	0	10	11	6	0	17	4	7	2	90
4	9	1	1	3	10	2	1	1	4	2	0	16	0	1	2	53
Total LEA Sample	16	15	8	18	52	15	8	18	27	13	25	45	13	12	14	299

*The use of "LEA" here denotes a school district, or "SITE" in terms of the program study, rather than the administrative arm of that district.

APPENDIX IV B: SAMPLE DESCRIPTIONS (cont'd.)
TABLE B3: TITLE IV PACQ SAMPLE

	LEA															
Role-Group	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Group Sample
1	6	6	5	5	10	2	7	6	12	1	24	6	2	4	4	100
2	0	6	2	9	12	2	0	1	0	4	1	6	7	0	6	56
3	1	2	0	1	20	9	0	10	11	6	0	17	4	7	2	90
Total LEA Sample	7	14	7	15	42	13	7	17	23	11	25	29	13	11	12	246

TABLE B4: JOM PACQ SAMPLE

	LEA															
Role-Group	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Group Sample
1	0	6	5	10	10	4	0	0	0	5	0	0	5	2	6	53
2	0	6	2	4	12	0	7	7	0	0	0	0	4	2	4	48
3	0	2	0	1	20	9	0	10	0	6	0	0	4	7	2	61
Total LEA Sample	0	14	7	15	42	13	7	17	0	11	0	0	13	11	12	162

TABLE B5: BCQ SAMPLE

	LEA															
Role-Group	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total Group Sample
Indians	5	1	0	1	0	5	0	10	12	2	13	1	3	3	4	60
Non-Indians	31	0	10	12	8	5	7	1	17	8	6	15	10	12	9	151
Total LEA Sample	36	1	10	13	8	10	7	11	29	10	19	16	13	15	13	

NOTE: LEAs 9, 12, AND 1 ARE URBAN; THE OTHERS ARE RURAL

APPENDIX IV-C: ANALYSIS OF PROGRAM DATA AT A SINGLE SITE

The main program analysis was done for a combined sample from all 15 sites. While this type of analysis is preferable for showing national trends, it is also of interest to investigate the results at a single site. This has been done for the school district at LEA 5, State C. This site, which has been classified as rural for our study, is characterized as being part reservation and part bordertown.

The results are presented mainly in tabular form, with a minimum of discussion. It will be seen that these single-site results are in general agreement with the findings of the total-site analysis. Three special points should be noted in connection with the present analysis. First, since many of the scales are factual rather than attitudinal, scale variance should be attenuated at any one site. This will tend to reduce correlation coefficients, thereby obscuring relationships, e.g., between program success and other scales. Second, although Site 5 represents our largest sample size, (for the EDC and PAC questionnaires), the samples here are still too small for multivariate analysis to be valid. Therefore, associational findings are presented in terms of correlation coefficients, rather than in terms of multiple regression. Third, the data at this site are particularly useful for comparing missing data rates, since respondents were specificially requested here to answer all items that they could (rather than stressing that they should answer all items for programs with which they were affiliated in some way).

The sample, as shown in Table C1, consists of respondents for the business community questionnaire, 70 respondents for the educational content questionnaire and 52 respondents for the PAC questionnaire. Of these latter 52, 22 are Indian PAC members; they are distributed differently between groups 1 and 2 depending on which program is under consideration. Non-Indian PAC members are used only in connection with Title I, so that the sample size is reduced for the other two programs. Note also that group 3, the non-Indian administrators, teachers and teacher's aides, is identical for the three programs.

The business community is characterized by its strongly favorable attitude toward special Indian Education programs and by its uniformly negative opinion of the current educational program in terms of Indian needs. The favorable attitude toward Indian programs is positively related to educational level, and negatively, but very weakly, related to age and involvement in school activities.

Missing data rates on the educational content questionnaire are particularly high for Indian teachers and Indian students, but are also quite high on some scales for Indian PAC members and for non-Indian teachers. The non-Indian administrators seem to be the best-informed group.

Program success, as measured by the educational content questionnaire, is rated highest by the Indian students and lowest by the Indian PAC members; this result holds for all programs. Program relevance to Indian needs is also rated

highest by the Indian students, but the low group here is the Indian teachers. Among the other findings of this type, the most striking is the low rating of the Indian teachers on the teacher training scales, particularly in comparison to the ratings given by both the Indian PAC members and the non-Indian administrators.

The main correlate of program success for the Indian sample is good teaching. Indian-related predictors of success (training, program emphasis and PAC influence) generally have a negative effect. For the non-Indian sample, the results are quite different: teacher training, both Indian-related and general, is most important for the Title I program; program emphasis, in all three areas, and PAC influence are most important for the Title IV program; and for the Johnson-O'Malley program none of the predictive scales seems to be important. The success ratings for the three programs are strongly interrelated, and all three of these success measures are positively related to general educational relevance. These results hold for both the Indian and the non-Indian samples, but are stronger for the former.

Missing data rates for Title I and Title IV PAC operations are low for the Indian members of those PACs and quite high for other Indian PAC members and for non-Indian administrators and teachers. For Johnson-O'Malley PAC operations, the Indian members themselves are apparently not well-informed, while the non-Indian administrators and teachers are better informed. Note also that for Title I

there is no particular difference between missing data rates for Indian members and for non-Indian members. In terms of particular scales, the most prominent finding here is the general lack of information on how PAC members are chosen and on the level of interaction among the three PACs.

Program success, as measured by the PAC questionnaire, is rated at about the same level by the various groups within a program; this level is highest for the Title I program. General educational success, however, gets a very high rating from Indian Title I PAC members and a very low rating from Indian Title IV PAC members. Comparison of scores for Indian and non-Indian PAC members for Title I shows that the non-Indian members report more training, more interaction with other PACs, more interaction with the community (in terms of dissemination), but less interaction with school personnel. On the other scales, the two groups have about equal mean scores. Comparison of Indian PAC members' scores with those of non-Indian administrators and teachers reveals, for Title I and Title IV, only the general result that the non-Indian group is not very involved in these programs. For Johnson-O'Malley, this conclusion does not seem to hold.

The main correlate of Title I program success, for the combined Indian PAC sample, is program publicity, with school interaction also being predictive of success; PAC interaction is seen as a negative influence for this program. For Title IV, PAC interaction and meetings are the

strongest two positive influences, although most of the scales show a positive correlation with program success; only selection procedures are seen as having a negative influence, and this relationship is weak. For Johnson-O'Malley, policy formulation is seen as most predictive of program success, with training, school interaction, PAC interaction and program publicity also playing a positive role; only selection procedures have a negative influence on program success. In regard to educational success (which is different from the educational relevance measure of the educational content questionnaire), Johnson-O'Malley is the only program that is seen as related to the general school program.

TABLE C 1; SAMPLE SIZES

Business Community Questionnaire: 8 respondents, all non-Indian

Educational Content Questionnaire: 70 respondents, in groups as follows:

Group 1, Indian PAC Members	8
Group 2, non-Indian Administrators	12
Group 3, non-Indian Teachers	23
Group 4, Indian Teachers	12
Group 5, Indian students	15

PAC Questionnaire: 52 respondents, in groups for each program as follows:

	Title I	Title IV	JOM
Group 1, Indian PAC Members	6	10	10
Group 2, Indian, other PAC	16	12	12
Group 3, non-Indian school staff	20	20	20
Group 4, non-Indian PAC Members	10	--	--

TABLE C 2: BUSINESS COMMUNITY DESCRIPTION

Mean values:

Age	3.6 (early 40's)
Education	6.6 (college graduate or near-graduate)
SCHINV	32
SPECP	96
PSUCA	14
PSUCI	0
COLL	62
AGRI	50
VOCA	87

Correlations with SPECP:

Age	-0.15
Education	0.47
SCHINV	-0.16

TABLE C 3: EDCQ MISSING DATA RATES

Scale	Group 1	2	3	4	5
PSUCI	50%	17%	22%	33%	53%
PSUCV	25	17	43	50	80
PSUCJ	25	0	0	0	13
PREL	12	0	0	8	0
TT/IR	50	0	9	33	53
TT/GEN	12	0	4	17	13
PEMSMI	50	25	26	58	67
PEMMII	75	58	57	92	93
PEMIRI	75	50	49	83	93
PEMSMV	38	42	87	67	93
PEMMIV	38	33	83	92	100
PEMIRV	38	25	87	67	80
PEMSMJ	75	17	39	33	7
PEMMIJ	75	17	61	42	7
PEMIRJ	75	25	43	42	13
PSFADM	38	25	17	17	20
PSFPAC	38	8	26	25	53
PSFTCH	38	8	0	17	13
PSFFAM	38	8	22	17	33

TABLE C 4: EDCQ MEAN SCORES

Scale	Group 1	2	3	4	5
PSUCI	50	77	69	65	75
PSUCV	50	70	54	54	99
PSUCJ	62	75	68	89	86
PREL	76	77	77	69	88
TT/IR	44	37	29	13	33
TT/GEN	44	51	41	22	46
PEMSMJ	--	83	79	84	62
PEMMIJ	--	78	81	71	60
PEMIRJ	--	70	61	66	54
PSFADM	89	74	79	85	80
PSFPAC	93	77	83	85	60
PSFTCH	83	90	94	92	90
PSFFAM	81	80	81	88	80

(Omitted scales have too much missing data to be validly interpreted)

TABLE C 5: CORRELATES OF PROGRAM SUCCESS (EDCQ)

	Indians (groups 1,4,5)			Non-Indians (groups 2,3)		
Scale	Title I	Title IV	JOM	Title I	Title IV	JOM
PSUCI	--	0.87	0.60	--	0.47	0.80
PSUCV	0.87	--	0.72	0.47	--	0.64
PSUCJ	0.60	0.72	--	0.80	0.64	--
PREL	0.57	0.44	0.31	0.32	0.29	0.12
TT/IR	0.43	-0.30	-0.50	0.53	0.09	0.15
TT/GEN	0.30	0.12	-0.16	0.49	0.08	0.10
PEMSMI	-0.01	--	--	-0.04	--	--
PEMMII	--	--	--	0.10	--	--
PEMIRI	-0.39	--	--	-0.19	--	--
PEMSMV	--	0.18	--	--	0.46	--
PEMMIV	--	-0.58	--	--	0.32	--
PEMIRV	--	-0.17	--	--	0.55	--
PEMSMJ	--	--	0.06	--	--	-0.24
PEMMIJ	--	--	0.27	--	--	-0.16
PEMIRJ	--	--	0.19	--	--	-0.05
PSFADM	0.12	0.10	-0.04	0.28	0.32	0.22
PSFPAC	-0.29	-0.32	-0.18	0.43	0.49	0.18
PSFTCH	0.44	0.43	0.40	-0.02	-0.02	-0.09
PSFFAM	0.21	0.09	-0.23	0.07	0.34	0.22

TABLE C 6: PACQ MISSING DATA RATES

	Title I				Title IV			JOM		
Scale	G1	G2	G3	G4	G1	G2	G3	G1	G2	G3
KNOW	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
T/GEN	0	31	30	0	10	33	55	0	33	15
ACT/PF	0	44	55	10	10	75	65	30	58	35
SCHINT	0	0	0	0	0	0	0	0	0	0
CONTRL	0	31	20	0	0	33	25	20	17	20
PACINT	17	75	75	40	50	92	90	50	75	65
SELECT	17	94	85	40	40	83	90	80	83	60
MEET	0	38	15	0	0	42	15	10	33	10
PROPUB	0	44	25	0	0	50	20	0	42	5
PROSUC	0	50	20	0	10	75	50	10	58	5
COMINT	0	44	50	10	10	50	50	60	8	50
T/NEED	17	19	25	20	10	25	25	30	8	25
HIRING	0	19	20	0	0	25	20	30	0	20
EDSUC	17	19	25	0	0	33	25	30	8	25

TABLE C 7: PACQ MEAN SCORE

	Title I				Title IV			JOM		
Scale	G1	G2	G3	G4	G1	G2	G3	G1	G2	G3
KNOW	78	13	42	87	88	21	29	50	18	49
T/GEN	16	4	48	55	29	4	11	28	1	44
ACT/PF	95	96	97	86	87	93	85	84	75	91
SCHINT	84	14	45	57	52	16	41	43	29	53
CONTRL	38	17	40	48	45	18	41	63	16	46
PACINT	40	74	59	82	--	--	--	59	66	85
SELECT	24	--	99	31	--	--	--	--	--	--
MEET	63	24	41	62	71	17	30	24	39	31
PROPUB	99	11	53	74	89	33	53	25	36	52
PROSUC	82	70	82	78	63	56	69	73	82	79
COMINT	43	13	35	66	54	8	32	48	8	48
T/NEED	53	36	39	51	67	35	25	70	36	46
HIRING	83	15	48	73	63	18	43	66	16	66
EDSUC	99	23	33	50	20	74	33	57	36	33

TABLE C 8: CORRELATES OF PROGRAM SUCCESS (PACQ)

(For Indians - groups 1 and 2)

Scale	Title I	Title IV	JOM
KNOW	0.22	0.21	0.27
T/GEN	0.03	0.04	0.37
ACT/PF	-0.18	0.29	0.76
SCHINT	0.32	0.28	0.52
CONTRL	-0.02	0.15	-0.06
PACINT	-0.29	0.44	0.45
SELECT	0.10	-0.15	-0.45
MEET	0.18	0.40	0.17
PROPUB	0.75	0.30	0.31
COMINT	-0.15	0.31	0.11
T/NEED	-0.39	-0.33	0.23
HIRING	0.24	-0.01	-0.44
EDSUC	0.04	-0.01	0.59

APPLNDIX IV

D. SELECTED PROGRAM SITE NARRATIVES

When site visitations began on the study, we decided to record incidents, activities and discussions to help evaluate sites and to be useful in preparing the final report. For each site we maintained records of persons interviewed, including school board members, PAC members and business community members. As a result, we have compiled an interesting log of information which we consider important enough to include in this report. The record of site reports indicates several important elements of the study which must be taken into account in presenting findings and recommendations.

Beneficiaries of educational programs have preconceived ideas of what programs are intended for within an LEA, based on the information available from the LEA. Their limited knowledge of a progam may bias their opinion of its intent and of the parameters within which they can contribute to its overall success.

As parents they are aware of the progress their children are making in schools, and they want their children to succeed. They attribute student success to the sophistication of the programs and to the ability of teachers to relate to Indian children.

Their knowledge of federal programs for Indian children is increasing and they are no longer willing to permit their children to take a back seat to anyone in terms of success in a classroom.

Background Information

The sampling involved fifteen study sites in nine states, selected because of one common characteristic. Each site had a significant number of Indian students within the LEA and was receiving significant amounts of federal funds from Johnson-O'Malley, Title IV, Title I or Public Law 874. In addition to administering the questionnaires to the parents and the education and business community, we encouraged open discussion to extract opinions relative to these programs.

Other factors were included when we thought they made important contributions to the overall scope of the study. The information which follows has been taken from those reports.

Information Obtained From Each Site

A major problem at most sites was that we came at the end of the school year. Many parents were not at home, teachers were leaving for the summer and students were dismissed from classes. Had we come a day later, we would have completely missed interviewing at one site in Alaska, since the villagers were preparing to leave on a whale hunt.

At each site interview appointments were made with the superintendents of the LEAs and the Federal Projects Officers to set up meetings with the PACs for each program. At these meetings we obtained the names and addresses of the school board members and the members of each PAC. Additionally, we sought whatever program information would be pertinent. We talked to students whenever possible. Most of the school personnel were cooperative and readily answered the questions we asked. Parents volunteered information as well. In some sites the business community did not offer as much information as we would have liked, but, nonetheless, most of the people cooperated in filling out the business community questionnaire. At one site, however, several businessmen refused to complete questionnaires because they feared their businesses might be hurt by repercussions. (We were unable to persuade them that they need not identify themselves nor their businesses.)

Many of the parents interviewed did not know enough about the programs to fill out the questionnaires. This paralleled a Johnson-O'Malley coordinator's belief that neither the parents nor the Tribal Council could offer support to the program because of their limited knowledge about it. The coordinator also stated that although some training of community members had taken place, not enough emphasis had been placed on this area.

At one predominantly Indian site parents indicated that the schools had not publicly informed them of the availability of Title IV. This limited their input into the planning process. One school informed parents that Title IV funds came into the district to hire more teachers and pay for books, supplies and insurance costs. Parents said that the superintendent told the PAC what criteria were involved in developing programs and that the public meetings called for in the rules and regulations were to inform the parents of his plans after the program was drawn up and ready for submission. When 27 parents sought information regarding the program he had them arrested and jailed. These same parents said that funds were not being used as intended by Congress and that they wanted to have more say about their use.

At another site a complicated cooperative agreement exists between the county school system and the BIA Area Office which permits the two agencies to share facilities, buses and P. L. 874 funds. The parents are not aware of the process and its functions, since no information has been given them. Many of these parents are becoming assertive and are making demands on the county schools. They want to know how these funds are benefiting their children, and they want a voice in deciding the use of such funds. Yet when the field work was done, a number of committee members failed to fill out the questionnaires.

The seeming reluctance to fill out questionnaires on the part of the Title IV and Title I committees stemmed from the inactivity of the committees. They were also concerned about their limited knowledge of how these committees were selected.

In other sites, these federal programs were extremely important to the school system. One superintendent stated that Title IV had increased parent and general community interest in the school.

The urban communities concentrate their programs on maintaining liaison with parents and direct their activities toward keeping students in school. In one site, the 20-member PAC could not get a quorum and was inoperative. The Title IV committees also had problems with the school district's civil service over pay for and qualifications of employees.

We have attempted to point out the various factors which, overall, have an effect on Indian Education. To graphically illustrate these factors we have chosen to use the case-study approach on what Indian communities encounter in the educational process.

The sites of Ft. Yukon, Alaska; Grants, New Mexico; Robeson County, North Carolina; and Minneapolis, Minnesota were chosen to illustrate the varying geographic, social and economic factors which affect Indian people and --ultimately-- Indian Education.

1. Ft. Yukon, Alaska. Ft. Yukon is a village of

600 to 700 people on the Yukon River in central Alaska, just above the Arctic Circle. It is populated primarily by the Kuchin band of Indians. The principal religious denominations in Ft. Yukon are Episcopalian, Assembly of God and Catholic. The airlines serving Ft. Yukon provide limited employment opportunities. Seasonal firefighting and construction work round out the employment opportunities within the community. Eighty percent of the people are on welfare, with some employment provided by state, federal and village agencies. Subsistence hunting and fishing play an important role in supplementing the cash economy.

Travel in and out of Ft. Yukon is by air service or chartered flights which are used to bring in supplies. Roads have not been built in the region and automobiles are rare, except for a few that are used in the village. The Yukon River is used for travel to hunting and fishing camps that the villagers use.

Educational responsibility is split between the state and the BIA within Alaska. This, combined with the geographical isolation factors, imposes various complexities in the nature of educational program funding and delivery. These factors affect the quality as well as the sophistication of the educational programs.

Ft. Yukon has a K-12 elementary and secondary program which was recently turned over to the state by the BIA. A five-man advisory school board works with the administration

in an effort to make student problems visible and to recommend alternatives for improvement of the school. The basic operational support is provided by the state. Title I, previously in the school, will be lost because firefighting increased the residents' income in 1970. The program was used to employ bilingual teacher aides. Johnson-O'Malley funds have not been used in the school to date, but will be available for school year 1975.

Within the village we interviewed parents, students and available teachers. While most of the persons interviewed knew of Title I, Title IV or Johnson-O'Malley, most of them did not know the differences among these programs.

The teachers were mildly critical of the Title I program and complained that the teacher was involved too much in administrative work related to the program; that the aides were not given enough training; and that the program "targeted" on low achievers, setting them apart from other students, which was not justifiable in a communal situation. Programs should apply to all students so that all can benefit. Additionally, most federal programs seemed to be compensatory within the state when, in fact, a real need existed to improve the basic curriculum which should involve the consultation of local advisory boards.

The teachers were also concerned that the various federal programs required different application procedures,

funding criteria, etc., which did not permit adequate program planning. Some school districts hired grant writers, and those districts had an increased capability and potential to receive federal benefits. They maintained, however, that money was not the basic issue; the issue was the maintenance of an administrative capability within the school.

Bilingual education within the school was critical; however, the state had not established criteria for bilingual credentials. They said that the state needed consultants in various areas to work with potential teachers, especially bilingual educators.

Another impediment to educational progress at Ft. Yukon that they cited was central administration of the state-operated schools. To order basic supplies for classroom work, teachers had to requisition them through the central office, which then supplied them from a low bidder. By the time some of the materials arrived it was close to the end of the school year and they were of little use for that year. The use of federal funds for equipment also caused some problems for teachers, since they were told that they could not order anything unless the items were consumable and could be individualized. Hard equipment such as hardback books and audio-visual equipment could not be ordered according to these state guidelines.

A major concern within the school and the community was that federal programs were wrapped up in so many

administrative "hassles" that the program actually lost its emphasis when directly applied within the school. Educators felt that selection criteria needed some direction from local people and should involve a cultural orientation in addition to fundamental skills. Federal funding should be used to develop "model school" programs. They would like to see direct funding to states used as a supplement to state foundations and given schools on an equalized "sliding index" basis. They would also like to see a simplified proposal and funding format.

Members of the advisory school board believed their role and effectiveness within their school was diluted by their advisory status. Additionally, the previous school board operated on an autocratic basis, with the chairman making all of the major decisions. Consequently many things happened within the school that were not in the interest of the community. The new chairman wants to change this process and involve the community to a greater extent.

She is interested in foundation courses taught in the high school, such as good math and science courses, and also English. She wants the state to provide the materials that are needed to strengthen the basic program. However, teachers may override parental priorities and select materials and equipment not falling within a stated priority. For example, the priority of the advisory board included a science room and library materials, yet the teachers substituted playground equipment.

Another of her concerns is that the Anchorage central office is too far away to meet the needs of this community. If equipment breaks down, not only is there red tape to complete, but the equipment must be sent to Anchorage for repair. This may cause a six-month delay in the use of that equipment. She would rather see an SOS administrative office in Fairbanks or the option to contract with Fairbanks businessmen. She feels that material and equipment necessary for the upkeep of facilities are inadequate and not suited to the isolated condition of the school. She would prefer to have school maintenance men with capability for complete maintenance of the facilities at the school. The state fire marshal has given the school board a report of the same inadequacies for the last three years. The state has not yet acted to remedy them. This year she forced the compliance issue by telling SOS officials that the school will not open until the repairs are made. Additionally, she is dissatisfied with teacher turnover, but since there are no Native teachers, she sees no immediate solution. She is concerned about the quality of instruction acquired through the present certification requirement.

The Title IV program is used for cultural enrichment within the school. The summer program emphasized survival training (hunting, camping) as well as subsistence living. The SOS system received the funding and allocated funds to the village on the basis of the number of Indian children. The activities were coordinated with the school by the Advisory

School Board. Community members considered these programs more relevant, since they address the "real" situation of living in rural Alaska. They would like to see better-prepared people working in this program.

Students also feel that their education is being restricted because their learning experiences are confined to the village school. They would like to be exposed to more activities away from the village.

We asked high school students about various programs and the curriculum in their school. This session proved to be the most enlightening portion of the trip, since these students were very open with their responses. They did indicate, however, that this "openness" was due to the fact that we were outsiders, and that a rap session such as this would be suppressed by teachers or parents.

Their general attitude concerning their schools was that they were not challenging enough or hard enough to prepare them for post-high school programs. Teachers did not really care whether students attended classes or not. Students felt that a harder, more thorough curriculum should be integrated into the regular school program. At present elective courses such as chemistry, physics, etc., are offered by correspondence only. Students were asked if they had heard of prominent Eskimo or Native people (i.e., Joe Upicksoun, Morris Thompson, Willie Hensley, Charlie Edwardson, all prominent Alaskan Natives), and although they had, they were vague as to who these people are, though they could identify

First, family economics determined the degree to which parents participated in educational programs. This does not necessarily mean that all parents were not concerned with their children's education. However, the delicate balance existing between a cash and a subsistence economy is easily disrupted by other interests. A concern of many persons interviewed is how an educational system can be structured to take this factor into account. Local citizens do not really want to see a change, but outside economic pressures are definitely beginning to affect many of the communities in Alaska.

Second, because of the broad nature and styles of education in Alaska, conclusions are hard to draw on the basis of such an abbreviated study. Thus the basis for our review in Alaska will be limited. Recommendations from an in-depth analysis of a broader range of target sites would be more inclusive and, thus, preferable.

However, a further look should definitely be taken at the administrative structure of the state-operated schools to assess the program delivery. It appears that students in these schools are being denied an equal and equitable education. While many factors contribute to this, among the more important is the powerlessness of parent advisory groups to increase appropriations and influence program delivery. These observations are totally subjective, since classroom observations were not included because of time frame limitations.

2. Grants, New Mexico. Grants is a city of about 10,000 people in central New Mexico approximately 70 miles west of Albuquerque. The city is located on the famed Route 66 (U.S. Interstate 40) and the Santa Fe Railroad line. The climate of this region is classified as semiarid, and the elevation is about 6,000 feet.

Until the 1950's the principal employment opportunities were in ranching, tourism and, to a limited degree, railroad work. The discovery of uranium on the Laguna Pueblo Reservation created a labor boom which made Grants a community of major importance. Within several years the small village expanded to incorporate the village of Milan, with business developing to accommodate the influx of people who came to work in the mines at Laguna and the mills at Grants. The principal mining interests were the Anaconda Mining Company and the Kerr-McGee Corporation. They are still the major employers in the area.

The Laguna and Acoma Reservations are located approximately 20 miles east of Grants and the Navajo community of Thoreau is situated approximately 40 miles west. These Indian people use Grants as their major regional trade center.

The Grants Municipal School District #3 embraces all of the schools within the city, as well as a number of schools in the rural area and on the reservation. There are thirteen schools --two high schools, two junior high schools and nine elementary schools-- in the district. Of these, at least

five of the schools are on the Laguna, Acoma or Navajo reservations.

The district is governed by a five-member board of education which includes no Indians. At the time of our study the school administration also had no Indians, but a Laguna principal has since been hired for the Laguna-Acoma Junior-Senior High for the school year 1974-75. Indian people do work as counselors, teacher aides and tutors in the school programs, and an Indian administrator oversees federal projects within the district. None of these staff members is provided to the schools by local or state support. The positions are funded by Title I, Title IV or Johnson-O'Malley funds. Title I and Title IV also fund a kindergarten and remedial reading and math program. It appears that Title I programs are targeting on non-Indian children, while the district uses Title IV funds to target on Indian students. Both programs are basically remedial in nature.

Many Indian parents indicated that they do not know enough about the federal programs (or the educational programs) to contribute constructively to planning them. While administrators and program staff believe that existing programs are relevant, active parental participation would help to improve the overall quality of the programs. Some training in parental involvement has taken place but, according to a Johnson-O'Malley staff member, parental involvement has not been emphasized enough.

A number of parents from the Laguna and Acoma reservations prefer to send their children into Grants, since they think that these schools are better. They contend that the city staffs their schools with better teaching personnel, while the reservation schools receive mediocre or less qualified staff. While this may not be true, several reservation students did admit that they would rather attend Grants High School than Laguna-Acoma High School.

Indian people at Laguna and Acoma are interested in the education of their children. The Tribes operate extensive scholarship programs for higher education and are becoming quite vocal with regard to Johnson-O'Malley programs which are contracted by the All-Indian Pueblo Council. Additionally, there has been some discussion of contracting educational services presently operated within the BIA elementary school to the Pueblo Council.

The powerlessness of Indian people within the district is apparent in their lack of representation on the school board. Although the communities apparently have never undertaken an effort to get an Indian elected, they may do so as they become better informed.

3. Robeson County, North Carolina. Robeson County is located in the southeastern part of North Carolina, approximately 15 miles from the South Carolina state line and 50 miles from the Atlantic Coast. Some 30,000 Indians make

up most of the population of the county, living either in the rural areas or in the town of Pembroke. The principal economic activity in Robeson County is agriculture, supplemented by conservative development of small businesses catering primarily to the county's farm industry.

The Indians of Robeson County are not recognized by the Department of Interior for federal services, although they do have recognition (federal and state) as Indians. An Act of Congress in the 1950's known as the Lumbee Indian Act granted federal recognition but excluded them from existing BIA and Public Health Service benefits. The Lumbee Indians are proud of their ethnic ties and are determined to retain their identity. A small contingent of the Indian population claims descent from the Tuscaroras and prefers to be identified as such. Although many of their social and cultural determinants (i.e., language, religion, social patterns) have taken on new forms, the people are definitely identifiable as Indians.

Approximately 7,000 students attend one of the 25 schools within the Robeson County School System. The district schools are governed by a Board of Education, three of whose 11 members were Indian in the 1973-74 school year. The laws governing election of school boards have been challenged in the courts by the Lumbee Regional Development Corporation as being unfair to county residents (principally Indian). It is charged that a "double voting standard" is maintained to keep Indian influence minimal. By this standard, Lumberton city residents

may vote in both city and county elections, whereas county residents may vote only in county elections. Recent voter registration drives have increased the number of Indian voters, and this has now served to put more Indians into elected positions.

The school districts operate both Title I and Title IV programs within their schools for disadvantaged and Indian students. In addition, a Part B Title IV project is being carried out by the Lumbee Regional Development Corporation.

The Title IV project in the school system has stimulated some controversy within the county. Some parents maintained that the administration had not publicly informed parents about Title IV. They said a school official informed parents that Title IV came in to hire more teachers, and to pay for books and supplies and insurance costs. They maintained that basic material costs were paid for, in spite of the fact that parents have assumed major costs for books, materials and damage fees. The school district has used an income eligibility criterion for the use of Title IV funds and will not allow these funds to be used for parental cost items.

As required by law, a public meeting was conducted after a proposal had been drawn up, but only to outline the content of the proposal. The submission date was too close to allow time for any changes, and nothing was changed.

Twenty-seven of these parents went to the superintendent seeking information about the proposal, and when an understanding could not be reached, law officers were summoned and the parents were jailed. Evidently neither the superintendent nor the parents are aware that proposal content can be amended.

This parent group does not believe that Title IV funds are being used to meet the unique and separate needs of their children. They want to see courses with cultural relevance built into the curriculum, on the belief that pride in one's heritage can stimulate the learning process. They also believe that research projects are needed for curriculum development.

Nonetheless, the parent committee does in fact influence the administration of Title IV programs via priority selection. The district administrators have conducted an evaluation of their program with the principal respondents being teachers and Indian parents.

It is evident that Indians within the county are progressing in certain areas. However, a very important factor to be considered in determining progress is the total community. If a segment of that community is critical of the schools, then its criticism is worth listening to.

4. Minneapolis, Minnesota. Minneapolis is situated in the eastern portion of the state and is the major metropolitan center in the area. The city has a population of

900,000, which is composed of White Americans, Spanish-surnamed Americans, Asian Americans, Black Americans and American Indians. The two largest minorities in the inner city and urban areas of Minneapolis are Indian and Black. The total minority population is approximately 35 percent.

The Indian population of Minneapolis is approximately 10,000, with the principal Tribal groups being Chippewa and Sioux. In addition, a large number of transient Indians who migrate in and out of the city may not be included in this figure. The reason Indians move to Minneapolis is principally economic, since employment opportunities are often better there than on the reservations. The Indian unemployment rate in Minneapolis is 10 percent, however, or four percentage points higher than for other segments of the population.[1/]

The official school enrollment for foundation aid (October 5, 1973) stands at a little more than 58,000. This Minneapolis Public School population includes about 1,500 Indian students attending elementary schools, 560 attending junior high schools and 340 attending high schools. Another 131 Indian students attend schools at other locations in the area -- rehabilitation centers, hospitals, vocational training centers, etc.[2/] Major numbers of these students are attending schools in Special School District #1 (SSD-1). There are more than 80 schools in SSD-1, but a majority of the Indian students attend schools in an

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[1/] U.S. Department of Commerce, Census Information, 1970.

[2/] Ibid.

area south of Highway 94 and east of Highway 35 and in the area north of Plymouth Avenue and west of Washington Avenue. The schools in these areas have an ethnic mixture of Black, White and Indian. The highest drop-out incidence in these schools is among the Indian population.

The principal elementary schools are Whittier, Clinton, Greeley, Madison and Irving. They feed into Phillips Junior High School, which in turn feeds into South High School. To the north, Hawthorne and Hall Elementary Schools feed into Jordan Junior High School and in turn into North High School.

The district operates a Title I Program which emphasizes remedial math and reading programs. A 65-member PAC oversees the functions of the Title I program by means of a subcommittee structure. The local schools do not have PACs, although these schools may be benefiting from the program.

The school district also operates a Title IV program for Indian students. The Title IV program concentrates on social work aides/community liaison people who visit homes, work with students having problems and work at trying to increase Indian parental participation. Their objective is to keep Indian students in school. Additionally, an alternative school is in operation for Indian students who have dropped out of the public schools. It is funded by Title IV Part B. Prior to Title IV funding, the school district did not employ any Indians in any capacity. The Title IV program is serving to increase the visibility of Indian problems within the

schools and to encourage alternative courses of action to alleviate these problems.

Minneapolis is subject to a court desegregation decision calling for a public school ethnic distribution reflecting that of the overall population. No school can have more than 35 percent minority students. The city is now undergoing a major shift in attendance areas which may affect many of the schools which Indian children attend.

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APPENDIX IV-E: RESPONSES TO PACQ QUESTION 55

Responses to the Following Open Ended Question (#55) on the PAC Questionnaire: "Please use the following space to give any recommendations you have for improving educational system and special programs."

Respondent	Response
1. teacher/parent	There should be an organization at national and local levels to avoid duplication of program and money.
2. teacher	More accurate materials for children - more leeway in spending of monies to help secondary young people.
3. parent (IV)	In-service training for program personnel - train and educate parent committees on responsibilities of public school system - Need Washington level emphasis persuading schools to adapt educational systems - Need more public awareness of Indians' needs in educational systems.
4. community resource advocate	Educational systems do not meet Indian needs and others because it is too rigid, slow to change and often dehumanizing in its regimentation. Not enough individual attention; attention is given to chronic behavior of students and failure. Expansion of innovative alternative programs. Lowering of student/teacher and counselor/student ratios. Better school community relations. Improvement of Title I, IV and JOM programs. More counselors at secondary level. More home visits, medical and economic aid. For situations like Tulsa need a larger program of supportive services.
5. school board member	Need understanding locally, nationally and internationally. Learn trade or profession and not be wards of government. Make better living and be better citizens.

Respondent	Response
6. parent	More Indian teachers. Continue financial supportive services. Expand total program (IV).
7. community member	More classroom teachers. More parent involvement.
8. parent (IV)	Special program for instruction and guidance for Indian parents. More consideration for special ed., teachers and psychologists.
9. parent (JOM)	Indian people need more responsibility in planning for needs of Indian children. PAC should be given authority to supervise people.
10. parent (JOM)	More general meetings between Program Directors and communities. Open reviews of budgets and programs.
11. student	Planning responsibilities in the needs of Indian children, authority should be with supervision.
12. parent	More Indian History and Indian Culture in educational system and programs. Tuscarora Indians of North Carolina be added to Indian Education Act.
13. parent	Indian History and Culture and Indian language under Title IV (local).
14. parent	More community involvement.
15. parent	More TA for the communities and implementation of cultural enrichment and improvement of programs.
16. parent	Tuscaroras be added to I.E.A.
17. parent (I & JOM)	Get more Indians involved in program writing. Have local "Big Shots" travel districts and find out what is really needed.
19. parent (JOM)	More Indian teachers in school system. Indian culture classes for children.
20. parent (I & IV)	Title IV has really enriched students in bringing own Indian culture back.

Respondent		Response
21.	teacher	More emphasis in Pima culture and how to retain pride of heritage as they go out in the world.
22.	parent (I)	Title IV has really enriched students in bringing own Indian culture back.
23.	parent (IV)	Same as 22.
24.	parent (IV)	Same as 22.
25.	teacher	More Title I during summer with a variety of activities.
26.	parent (I & IV)	Same as 22.
27.	parent (I & IV)	Need information in reference to rules, regs, legislation, local budget and program and required activities of PAC.
28.	school administrator	Greater student involvement in planning and implementing of the programs.
29.	teacher	Total educational program needs overhauling and revamping. Take a good look at the school's educational philosophy. Rework and reword the goals. Develop curriculum and programs to achieve goals. Develop educational program that will guarantee success.
30.	teacher	More brainstorming by teaching personnel.
31.	school administrator	Federal government should be more aware in apportioning JOM funds in Arizona. There are numerous discrepancies in methods used. JOM definitely needs to be a support instead of program.
32.	parent (I)	More Indian professionals and paraprofessional counselors. 1-2 school psychologists. Better qualified school board members (too much political game playing). More carefully selected school administrators. More out of town field trips. More exposure to careers (on job career education). Better reading and English programs including remedial. Available summer school. Listen to what students, parents and alumni have to say.

Respondent	Response
33. parent (I & IV)	PAC should be trained in rules and regs of Titles I & IV and JOM. We should not use uneducated individuals as rubber stamp. Lectures should be given on rules and regs and not just handed out to be read.
34. parent (I, IV & JOM)	Placement of qualified Native Americans in policy and decision-making positions on state boards. Place qualified Indians in administrative and management positions in local school districts. Stipends and expenses given for vast amounts of volunteer time. Stipends are essential in the workshops, where essential learning, knowledge is gained. Once this happens, individuals begin to understand and give more of self to PAC. Mandatory workshops for school administrators and school boards. They always push general aid and not categorical aid. Provide information and understanding to all school district personnel on all federal programs funded and operating.
35. parent (I, IV)	More money for program expansion and improvement. Programs held down due to lack of funding. Adequate building funds for construction to place outdated school buildings on reservation. Indian parental input at state level on funding proposals affecting the education of Indian children. More Indian Culture based curriculum material. Certification for Indian teachers with special talents (Indian language teachers). College courses for prospective teachers on the various cultures as a part of "Requirement for a teaching certificate". Broader health programs in schools for glasses, dental, nutrition training and physical education for grades 1-8.
36. parent (I)	More thorough evaluation of Title I program to see if teacher is following through.
37. parent (IV & JOM)	Have more programs in helping parents to understand about education. Better evaluating system for future dropouts.

Respondent		Response
38.	parent (I)	Education for parents about what children are learning and potential.
39.	home room coordinator	Language development in English. More individual help for students (one-to-one learning). More culturally appropriate materials.
40.	home school coordinator	More guidance in jr. high and high school.
41.	school administrator	More parent involvement in Titles I & IV locally.
42.	parent	More community involvement.
43.	parent	Superintendent should keep Indian people better informed. Indian people should be more involved in obtaining federal grant so they will be better informed.
44.	parent/teacher	Indian people themselves should disburse Title IV monies to LEA's.
45.	school administrator	Consolidation of planning, implementation and evaluation would eliminate duplication.
46.	social worker (IV)	Lack of contact with Indians prior to job. Help of Indian aide has been an excellent start.
47.	teacher (IV)	More people, more participation and more money.
48.	administrator (I)	More individualized programs are needed. Greater incentive for parent involvement is needed.
49.	community aide (IV)	More communications on Title IV aides in the school system. Make the staff and personnel more responsive to Title IV aides in the school system. They should be included in all the training programs ongoing for Black minority and have same training for Indians.
50.	parent (IV)	Have certified Indian teachers tutoring Indian children on one-to-one basis.

Respondent		Response
51.	teacher	More money spent on pre-school programs with high parent involvement. Toy lending libraries and out and out gifts of books for children.
52.	school administrator	Consolidate all categorical programs to fund identified programs for students.
53.	parent (IV & JOM)	Have more of Title IV program. More parent advisory training on Title IV and JOM.
54.	teacher (JOM)	Put more stress in the early reading programs (especially phonics). Have the Indian speaking child speak more English at school.
55.	administrator (JOM)	More PAC training in Title I, IV and JOM.
56.	school administrator	JOM and Title IV are both very discriminatory in nature and therefore, should not be administered through the public school system.
57.	teacher	Schools need more supplemental help to help Indian students that normally make slower progress in primary grades due to language and cultural experiences and then need to work very hard to regain the gap. Programs in Reading, Language Arts and Math that will give students a concentrated course of study that proves to be effective. This is the only way students can "catch up" to the national norms.
58.	teacher	"I have no answers. I do feel, however, that we are not adequately meeting the educational needs of our Navajo students."
59.	school administrator	The best thing that can be done with JOM money is to let the local chapter houses handle parental service money. Chapter houses are best judge of how money should be spent.

Respondent		Response
60.	parent (IV)	Smaller class size in primary grades. More space so that special programs can function. More planning time for special programs. Title IV should be contracted to the local non-profit corporation for more real local control and less administrative costs. Could also get programs sooner. Better guidelines letting local advisory groups know rules and regulations about how and on what money can be spent.
61.	teacher/ administrator	Title I workshops at central office. Re: laws, guidelines should be well planned model workshops exemplifying good teaching techniques and show how to run workshops. Bring more of the "real" world into the classroom in the form of community people, signs and events. Take the kids out of the classroom for involvement in the "real" world. Kids have to learn that reading and math are means to problem solving and not ends in themselves.
62.	community aide (JOM)	Educational programs in this region should be centralized and run by people from within this region.
63.	community member	Students do not receive enough travel expense money because out in the bush travel is expensive. Funds would be used for basketball, trips, hikes, exploration, etc.
64.	parent (I, IV & JOM)	More school space. Multi-purpose room.
65.	school administrator (I, IV & JOM)	More school space. Gymnasium. Travel funds for field trips.
66.	parent (IV & JOM)	School board should have more power, such as hiring and firing of teachers. Now school board is just an advisory board. Teachers are hired by people that don't know a damn thing about the area they are hiring the teachers for. There are teachers here who

Respondent		Response
66.	continued	want to transfer, but are staying because there are no openings elsewhere. If the school board has the power to hire and fire these are the first people to get rid of.
67.	parent (IV & JOM)	More educational programs should be put into the hands of local community and let them run the programs they feel are best for their kids. Title I is very vital to the needs of our kids therefore Title I shouldn't go by 1970 Census.
68.	parent (I, IV & JOM)	"We have lost the Title I funding for our district because of the fact they used the 1970 Census for income, this was when a lot of people were unexpectedly employed for firefighting." We need stronger emphasis on a better quality high school such as science, math, language arts, and social studies and government so our children can be better prepared to take control of their own affairs and be professionals and paraprofessionals instead of hiring outsiders to handle these positions. The children need to be taught pride in one's self and to speak out!
69.	administrator (I)	The parameters of education must be defined at the local level by parents and people receiving the service. This is critical in culturally different populations where children do have a viable alternative life style. The purpose of education is to prepare the child for adulthood and bicultural communities have the right to bicultural education.
70.	administrator	More integration of special arts and crafts activities and other parts of the Native enrichment program where it may be possible. Native students should not be made to feel

Respondent		Response
70.	continued	separate or distinct in these programs--the goal of better understanding of native culture by non-native students is also important.
71.	parent (I)	More control in classrooms. This would help in all of the educational points. Stop with this Indian and Negro stuff and get down to helping all children that need help.
72.	home school coordinator (I)	More aides in the schools. Title I should be extended to upper grades. Should also know before the year is out if the program is going to be continued. More parent involvement.
73.	parent (IV & JOM)	The parent committee should be elected by the Indian community. Should have better information and training sessions. No materials available about Alaskan Natives, we need a history and be included in school curriculum. All school books that reflect a negative picture of native people should be destroyed or not allowed in school.
74.	Special project tutor	Need coordination between the tutors and the parents. Closer communications between the students and tutors.
75.	administrator	Meet with other Indian Education Act programs operating in urban centers to evaluate programs, relationships with school boards, parent committees, Indian parent involvement, etc.
76.	Native resource aide	Teach talented children their cultural heritage and more of the Alaskan history.
77.	parent/teacher aide	Teacher aides should be provided with teacher editions of all courses they teach. Abacuses could be provided to grades 1 and 2.
78.	teacher (I)	More career and vocational and Alaskan related relevant instruction.

Respondent		Response
79.	parent	More training should be given to tutors.
80.	administrator (I)	Less concentration on groups and more on needs of children having learning problems.
81.	parent (I)	More parent involvement in program. Parents would contribute greatly in planning these programs and assessing real needs of these children.
82.	teacher (I)	"Expansion to include students who are educationally disadvantated rather than economically or culturally disadvantaged."
83.	administrator (I)	More individualized instruction. Counseling on the elementary school level. We need more clearly defined guidelines (and interpretations) on Title I-ESEA.
84.	parent (IV)	More parents of native students should be involved in the Title I PAC. It should be mandatory for a certain percentage of native and black parents to sit on the board. Re "training"--our committee had no formal training, as we knew as much about the laws and regulations as the staff did. There just was not that much information from Washington to use in training. We learned by doing. If the law did not say not to do something we felt we were probably okay in doing it as long as we sent an amendment into Washington. Our role developed as a parent committee as the year went by. We rejected the school district's interpretation of our role and took one with broader scope and greater involvement. We would rather that the school district did not define (and limit) the role of the committee.

Respondent		Response
85.	parent (IV)	Need training sessions on federal regulations, guidelines and criteria for Title IV with other urban Title IV committees. This training session would help in exchanging ideas and etc.
86.	parent/teacher (I & IV)	More native/Indian teachers. Better screening of teacher applicants. Training in Title I regulations and laws. Training in Title IV regulations and laws and responsibilities.
87.	parent/teacher	Need more materials for slow readers, children with learning disabilities and a basic reading series for children with problems that is not accelerated.
88.	administrator	Cut the red tape and use time to get to the basic program. Cut unnecessary reporting and duplicate reporting. 100% coordination between the different programs. Too much overlapping of programs and reporting.
89.	teacher (I)	Need more Indians as teachers, principals, administrators, and etc. Need to set up bilingual classes. Need to hire teachers who like teaching and not money first!!! Need to offer harder classes on the reservation. Need to allow more for field trips. Need to have better counselors working with Indian students. Need to have more rodeos, etc. Activities that they enjoy. Need to encourage more parents and get involved with school. Need more vocational courses on the reservation.
90.	administrator (I, IV & JOM)	These programs in many cases are allowed to drift along. The real test of most of these are yet to be determined. They all need to be re-assessed as to where they are headed and perhaps be redirected.

Respondent	Response
91. teacher (IV)	What our children need is knowledge of the outside world. For this they need many books. Not just of their own culture but things that will familiarize them with the mainstream of our nation. They need contact in the outside world. They need many field trips both short and long.
92. administrator	Special provisions should be made to help children who have emotional problems. We have a large number of children who because of unstable (insecure) home conditions are in need of special psychiatric type of help. Projects should include well trained counselors (Indian preferably Navajo) to work at elementary level.
93. parent (IV & JOM)	We need to have JOM funding and programming clarified as to who will be in charge of programs: BIA, the state, the Tribe, or through the district systems. People on the PAC. Committee needs to have training in running, planning and evaluating of the federal programs.
94. teacher (I)	Hire principals and teachers who would support such programs. Offer workshops to inform teachers or to share ideas.
95. parent/teacher (IV)	Need for getting teacher training programs out to the Indian communities. Goal--to train Native Americans for teaching jobs. Need to provide programs at more sites to train Indian educational administration, such as principals, personnel directors, superintendents. Need to make arrangements with school districts to provide incentive pay for trained Indians to go into curriculum development work.

96.	teacher	Special programs need tc be extended to reach more students. The reading lab is the only special program from JOM in the High School. I think there should be other programs such as math programs or Indian studies programs. I do think the reading program is an excellent one.
97.	administrator (JOM)	We need more programs. Also need to have in the law ways to buy buildings to house programs- ways to reach more children in the programs.
98.	teacher (JOM)	The area could use more communications skill system laboratories. More cultural experience could be provided. More parental involvement.
99.	teacher aide (JOM)	Involving more students in special programs and bringing into the classrooms more methods for understanding non-cultural (unaware) experiences. Having more (as many as possible) field trips to broaden the scope of our Indian children. Make sure the teachers are aware of Indian cultures to avoid conflcits between them and our students and also so the students receive the most from our educational programs.
100.	parent (JOM)	To my knowledge the JOM, Title I and Title IV has and will continue to be successful. We are behind this program.
101.	administrator (I, IV & JOM)	We need the programs I evaluated because they meet the needs of the students.
102.	parent/teacher (JOM)	More bicultural-bilingual programs are needed, in this particular school. More money is needed in kindergarten classes for instructional aides and culture materials. More money allocated for field trips. Because of the distance of Crownpoint to areas of interest and places for educational experiences, overnight trips need to be considered. Money could be allocated for summer

Respondent		Response
		field trips for groups of Navajo children who may never get to places such as Disneyland or seeing an ocean and such. Teachers need to know more about funding and where money goes and how much is available for different purposes.
103.	teacher aide	More of the JOM Reading Labs. Have perfect attendance (students). Improving their education. Parental support of local school system. Home visits. Parent involvement in the programs.
104.	teacher	Sufficient facilities to enable all students who wish to improve their reading and communication skills to have special help. Parental support of local school system. How can this be achieved? Home visits and open houses are not enough. It takes lots of personal contact.
105.	community member	More of the JOM Reading Labs. Have perfect attendance (students). Improving their education. Parental support of local school system. Home visits. Parent involvement in the programs.
106.	student	Try to get students involved. Get more special programs that would interest students.
107.	student	Lots of students are getting out of school because of lack of communication in the school. There should be more reading labs and a place to read or do something.
108.	student	Build a junior high school. Get a bigger room for more students.
109.	administrator (I, IV, JOM)	Too many PAC's. Should have one well established PAC with sub-committees for each program. This is a very poor time to do a survey. Much incorrect information from staff and parents will

Respondent		Response
		be reported. Most parents aren't able to read and interpret this form.
110.	parent/teacher aide	JOM: Provide funds for trips for enrichment of students. Develops program for cultural awareness.
111.	parent/teacher (IV)	The Title I programs need to be coordinated. There needs to be follow through on all individualized programs and other programs that exist in the classroom. Changes should be considered before continuing that particular program that is ineffective. All three programs in this system have emphasis on reading. These programs should be expanded so that all pupils would have this opportunity. This would mean having two of the similar programs in one school.
112.	teacher	Need for program funds for enrichment activities, i.e. field trips, cultural activities etc.
113.	teacher	The Vocational Department head has in Oklahoma built FHA approved vocational class houses. First year they built one and had enough profit to build two the next year. He did this several years. He should be funded to do a similar program.

APPENDIX V: BIA REVIEW

According to the Office of Indian Education Programs of the Bureau of Indian Affairs (BIA) in 1972 there were 187,613 Indian students enrolled in federal, public, private or mission schools who were eligible for BIA services. Eligibility is determined by having one quarter degree of Indian blood and being from a federally recognized Tribe, band or group of Indians. This of course, excludes a number of Indians whose Tribes do not have such recognition.

To carry out its educational responsibilities to Indian children the BIA must function under two legislative authorities that provide the basis for federal support.

The Snyder Act of 1921 (P. L. 67-85) is the "statutory basis for the majority of elementary, secondary and adult education programs currently carried out in the federal schools of the Bureau of Indian Affairs."[1/] This Act has broad authorization and can be used for activities including health and welfare programs; construction and maintenance of buildings, irrigation systems and water supplies; and employment of inspectors, supervisors, superintendents, clerks, field matrons, farmers, physicians, Indian police, judges and other personnel. Additionally, equipment may be purchased under this Act, and under it programs for suppressing

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[1]David S. Osman, Major Federal Legislation Affecting Indian Education (Mimiographed paper, Education and Public Welfare Division, BIA, March 2, 1971), p. 5.

traffic in intoxicating beverages and deleterious drugs can be implemented. Authorization for educational programs is found in an ambiguous section which reads:

> "[That the BIA may] expend such monies as Congress may from time to time appropriate, for the benefit, care and assistance of the Indians . . . for the following purposes: General support and civilization, including education . . ."[2]

This authorizes the BIA to operate federal schools for Indian children ". . . living on Indian-owned or restricted trust land." In 1973, the BIA operated 195 boarding and day schools with an enrollment of 51,180 students. Of these, 26 schools were operating full four year high school programs; seven others offered high school training at "less than the four year course."[3]

These federal schools experience high drop-out rates and similar management problems to many other schools throughout the United States. In addition, they run into further problems of adapting the federal bureaucracy to school operation. This problem will be discussed later in this section.

The Johnson-O'Malley Act (P. L. 73-167) authorizes the Secretary of Interior to contract with any state, territory or political subdivision thereof, state universities,

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[2]Act, November 2, 1921, 25 U.S.C. 13.

[3]U.S. Department of Interior, Statistics Concerning Indian Education (Office of Indian Education Programs, Bureau of Indian Affairs, 1973), p. 2.

colleges or schools or appropriate state or private corporations for "education, medical attention or social welfare" of Indians living in the United States. Under its authority the BIA currently contracts with a number of states and Tribal organizations for educational programs for 128,525 Indian students in public schools (this represents 62.7 percent of the Indian school enrollment in the United States).[4/] In considering the educational programs administered by the BIA, it must be kept in mind that BIA enrollment figures represent only Indians who are recognized by the Department of Interior and are living on "restricted trust" land, or who are recognized for BIA services and have one quarter degree or more of Indian blood.

The following discussion has been necessitated by the recent publications of new Johnson-O'Malley regulations (released by BIA August 16,1974 and published in the Federal Register August 21, 1974). While it is beyond the scope of this report to address the total management process of the Bureau of Indian Affairs, a discussion of the Bureau's management of the Johnson O'Malley program is in order. The following is based on a review of the newly published BIA regulations for the Johnson-O'Malley program; memos and statements of BIA officials interpreting the regulations; a review of BIA management documents and internal manuals; and upon non-structured interviews with area office BIA personnel.

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[4]U.S. Department of Interior, Statistics (1973), p.2.

BIA Administration of Johnson-O'Malley Programs

Essentially, financial assistance through Johnson-O'Malley programs can be divided into two categories: 1) supplemental programs to meet the special unmet needs of Indian children, and 2) basic operational support costs for the school. Basic support costs are permitted only in cases where the school district cannot meet state standards through its local and state effort, and Johnson-O'Malley funds cannot be used until all other resources (including P. L. 874) have been exhausted. The school district must have at least a 70 percent Indian enrollment in these "extraordinary or exceptional" circumstances.

The new Regulations authorize payments to contractors for supplemental programs which must be distributed on an equitable basis. The formula for supplemental support is based upon:

> ". . . the number of eligible Indian students for whom the funds are sought, with allowance being made for the actual cost of delivering educational services in each state. For the purpose of determining the actual cost . . . the Commissioner shall refer to the average state-wide per pupil expenditure."[5]

Additionally, schools that are eligible for contracts under this authority must file an educational plan that outlines: budget and financial information, reporting criteria, assurance that state standards will be

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[5] Federal Register, Vol. 39, No. 163 (August 21, 1974), p. 30115.

maintained, Indian preference in hiring, inspection of programs and documents, and parental participation. Perhaps the strongest direction contained in the Rules and Regulations is that Parent Advisory Committees have veto power over the educational plans that are developed by the school districts. This will ensure that programs for Indian students will be developed in consultation with Indian parents.

Under Section 33.2 the new regulations state that:

> "Contracts may be entered into under the provisions of the Johnson-O'Malley Act with a state, school district, or Indian corporation for the education of Indian children from early childhood through grade 12."6/

They also state that:

> "Monies shall be expended under contract only for the benefit of Indian children who are recognized by the Secretary as being eligible for Bureau of Indian Affairs services because of their status as Indians. Nothing in these regulations shall prevent the Commissioner from contracting with Indian corporations who will expend all or part of the funds in places other than the public or private schools in the community."7/

The above provisions in the newly published regulations have created an apparent conflict between BIA officials in interpreting the Regulations. A memorandum to the Commissioner of Indian Affairs dated September 18, 1974 from Reid Peyton Chambers, Associate Solicitor, Indian Affairs,

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[6] Ibid.

[7] Ibid.

U.S. Department of Interior, contains the following:

> "Mr. Dean claims that a Bureau official has indicated that a private school, such as the Menominee Community School, which is operated by an Indian-controlled corporation chartered under state law is ineligible for Johnson-O'Malley Act (JOM) funding. Under the revised JOM regulations to become effective September 20, 1974 (39 Federal Register 30114), an Indian Corporation, as defined in Sec. 33.1(g), is eligible, as provided in Sec. 33.2(a) and (b), and any position to the contrary is clearly inconsistent with the regulations. This does not mean that the BIA must provide education funds to the school discussed in Mr. Dean's letter. There is, however, no legal obstacle to the Bureau's providing such funds to the school as we understand the facts."[8]/

Because the new regulations contain the provision cited above, several Indian-controlled schools chartered as non-profit corporations under state law have approached BIA officials for the purpose of contracting for Johnson-O'Malley programs. Mr.Dean, a Washington-based lawyer representing such schools, sought the Solicitor's opinion after the schools were informed by the Director of the Division of Educational Assistance of the BIA that such schools were not eligible to contract for Johnson-O'Malley funds.

The Division of Educational Assistance is located in Albuquerque, New Mexico. The Departmental Manual

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[8]U.S. Department of Interior, Memorandum to Commissioner of Indian Affairs from Associate Solicitor, Indian Affairs, Eligibility of Menominee Indians for BIA Education Funds, Office of the Solicitor, Interior, September 18, 1974.

describes the functions of this division as follows:

> "C. The Division of Educational Assistance provides staff assistance to the Director regarding the Johnson O'Malley, Elementary and Secondary Education Act titles and other flow-through funding programs. The Division coordinates these programs for the Director. It assists in the development of plans for specific services to Indian students in public or contract schools. It provides for the development, administration and monitoring of the various title programs for the Elementary and Secondary Education Act and other programs administered by the Office of Education. It develops general policies and standards for its assigned progress." 9/

We contacted the Division of Educational Assistance in Albuquerque following the release of the Associate Solicitor's memorandum. We were informed that BIA contract schools and private schools were not eligible for Johnson-O'Malley funds. We then contacted an Area Office with the question "Are BIA contract schools eligible for Johnson-O'Malley funds under the new regulations?" The person at the Area Office said that in his opinion contract schools would not be eligible since they are the "funding responsibility" of the BIA and not public schools. He also stated that private schools, such as Indian-controlled schools funded by foundations, are not eligible for Johnson-O'Malley money.

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[9] U.S. Department of Interior, Departmental Manual, Part 130 Bureau of Indian Affairs, Chapter 6.2c, Indian Education Program, 1974.

While the organization manual of the BIA states that the Division of Educational Assistance develops general policy and standards for its assigned programs, the final authority rests with the Commissioner of Indian Affairs. When the Central Office, i.e. the Commissioner, does not issue a policy statement, the ultimate rule for interpreting rules and regulations is reduced to the relative political strength of Bureau officials. It is not clear to Indian people who has the final authority.

We are aware that the Central Office has not come out with a policy statement or definitive interpretations of this regulation. The Albuquerque Division of Educational Assistance is making its own interpretation of what it thinks the rules and regulations should be.

Such inconsistencies on the part of the BIA are understandable, however, in view of the administrative structure, funding mechanisms, and the planning and control system that are built into the BIA. The structure and mechanics of the BIA organization ensure that the system will become repeatedly snarled.

The BIA has received numerous recommendations from various sources to modify its administrative and management processes. The Coalition of Indian Controlled School Boards, a non-profit Indian controlled organization seeking local control of education, has diligently sought a central level of contracting authority for educational services

within BIA.[10] Additionally, a study completed in 1969 by ABT Associates, Inc. on the operation of BIA schools outlined the basic problems of BIA administration and recommended changes for educational improvement. Their findings disclosed that:

> "The management structure for Indian education must be related to the flow of resources into Indian education for progress and rational planning to take place. If large amounts of Federal funds are to be expended for Indian education, a clear chain of authority and reporting is essential."[11]

This massive study focus ed primarily on the BIA school structure, but it is worthy to note that responsibility for educational contracting is that of the Office of Indian Education Programs of the Central Office. The ABT study disclosed that a "chain of authority" does not exist within BIA. This fact accounts in part for the documented inefficient administration of the Johnson-O'Malley programs by the BIA. Thus one of the recommendations of this study was,

> "Control of the personnel, funds, and information needed to implement improvements in BIA schools is not now in the hands of those responsible for

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[10] U.S. Congress, Senate, Committee on Interior and Insular Affairs, Statement on S. 1017 of the Coalition of Indian Controlled School Boards Hearings before a subcommittee on Indian Affairs, 93rd Congress First Session, June, 1973.

[11] ABT Associates, Inc. Systems Analysis, Program Development and Effectiveness Modeling of Indian Education for Bureau of Indian Affairs, Vol. II. p. 196, (Cambridge, Mass: by author,) 1969.

> student and teacher performance. Sound management practice requires, however, that control and authority match responsibilities. Therefore, a pre-condition to major improvements in the BIA schools is the granting of direct line authority over the schools to the Central Office Division of Education responsible for their performance."[12]

The BIA did not implement the recommendations of the ABT study. In a response to Senator Abourezk's office regarding the study, BIA officials maintained that implementation would in fact be unfeasible.

> "The recommendation that a separate line of authority for Bureau education programs, apart from other divisions of the Bureau, has merit. Some of the problems of the present system and some advantages of the recommended change are detailed in Vol. II of the report (pages 192-97). The basic advantage is that it gives education administrators the authority and responsibility for education programs. Under the present structure the line authority may reside with an Area Director or Agency Superintendent whose principal interest and ability is in land management, economic development or some other field. The recommended structure, however, would further fragment Indian services, giving education an autonomy approaching that of the Indian Health Service. To be effective, various administrative structures and services of the Bureau would have to be duplicated within education. This would involve additional expense."[13]

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[12] Ibid Vol. II, p. 40.

[13] U.S. Department of Interior, Letter from Commissioner Morris Thompson to Senator James Abourezk on ABT Associates Study, Bureau of Indian Affairs, Dec. 19, 1973

Efficient and economical management of educational programs is apparently not within the purview of the current structure of BIA, but rather, a concern for other "trust responsibilities" that must be carried out by BIA. We must point out that in 1974 the total BIA budget was over $414 million; of this about $220 million was specifically designated for educational programs. This represents well over half of the total BIA allocation which certainly should require and merit special line authority separate from the various offices within the BIA. Restructuring of educational programs doesn't necessarily mean an assumption of additional costs but, rather, forces the BIA to be accountable to Congress and those that are intended to be served. Concern for "additional expenses" on the part of the BIA is indeed meritorious; however, the existing system that BIA top officials continue to defend can't possibly lead to efficiency or economy.

The Bureau of Indian Affairs Structure and Basis of Authority

Policy-making authority is restricted to the Central Office of BIA. It is here that legislative rules and regulations and judicial interpretations are made and transmitted for implementation throughout the BIA structure. This office is under the direction of the Commissioner of Indian Affairs, who in turn answers to the Secretary of the Interior. The Office of Indian Education Programs is

under the Commissioner's Office and is headed by the Director of Indian Education Programs. This director has policy-formulating authority only within his own sector; he has no line authority over other BIA personnel.

The BIA is divided into thirteen administrative "Area" offices directly responsible for carrying out program functions for Indian beneficiaries. The Area Offices are headed by Area Directors appointed by the Commissioner with the concurrence of the appropriate Tribes. The current policy is that Area Directors have full authority to act in any matter under their jurisdiction. This in effect means that an Area Director can override central authority on the basis that he is acting in the interest of Tribes within his area.

The jurisdictional problem is even more complicated with regard to education. As stated above, the Director of Indian Education Programs is responsible for formulating policy but has no line authority to carry out this policy. Directly under the jurisdiction of this office are the Indian Education Resource Center (located in Albuquerque, New Mexico) and four administrative divisions dealing with Post Secondary-Adult Education, Program Review and Evaluation, Education Assistance and School Facilities. Additionally, each Area Office has a Superintendent of Education responsible to the Area Director.

It appears that the Indian Education Resource Center may perhaps be responsible for carrying out educational

contracting functions with states and Tribal organizations and maintaining records for accountability. However, its precise function has certainly not been made clear to the Indian constituency that BIA is supposed to be serving.

The BIA has not refined a reporting process to plan adequately for funding educational programs, as is documented in a recent review of Tribal and BIA management functions. The review points out that:

> ". . . enrollment figures used to calculate the expenditures per pupil are total enrollment rather than average daily enrollment figures. The average daily enrollment data was not available for 1972-73 but in 1971-72 the total average daily enrollment was 78 percent of the sum of the total enrollment of each school."[14]/

The above statement refers to one particular agency and may not apply to other agencies in the BIA. The BIA also maintains that it expends in excess of $1,900[15]/ per pupil for education; yet the management report cited above states that the "adjusted" per pupil expenditure is $926.37.[16]/ This indicates that money appropriated for Indian Education is being trapped in the bureaucratic web of BIA. Basically, this is what happens:

- The Office of Management and Budget (OMB) and

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[14] Subcommittee on Indian Affairs Hearings, Committee on Interior and Insular Affairs (U.S. Senate, 93rd Congress First Session, June 16-17, 1973), pp. 365-506.

[15] Susan Smith et al., Federal Funding of Indian Education: A Bureaucratic Enigma (Bureau of Social Science Researh, Inc., Washington, D.C., 1973), p. 9.

[16] Ibid., p. 456

the Interior Department give the BIA a target planning amount which the total budget amount must equal. This occurs after field offices have submitted budget data based upon priority analysis "established by the Tribes."

- In the process priorities are shifted numerous times after review and in line with local priorities. The "mixture of program money must shift in the direction of the programs favored by Indians."[17]

Construction and welfare programs are not included in the plan since these funds cannot be traded against other program operational funds. When several Tribes are involved "opinions must be posted." Each agency is assigned a "base" and, if several programs are involved, cuts are established and then the priorities most essential for the welfare of the Indian people at that particular agency are established. While the planning is supposed to involve the Indian leadership, the process becomes ambiguous and unclear as to intent further on in the document. There are such questions as "What would the BIA want for each program if there was a 10 percent increase over 1975?" A better question might be "What happened to Tribal leadership?" The process, of course, has been simplified a great deal in this description

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[17] U.S. Department of Interior, Development and Use of the Priority Analysis (working document of the Bureau of Indian Affairs, October 24, 1973), p. 2.

and is not, per se, of any real concern here. What is important, however, is that in the process of distribution the directive sets forth no process for planning educational programs. The increase appears to be arbitrary and reference to average per pupil expenditures or other established financial criteria is left to the option of the area director.

Two key phrases are noted in the planning directive:

- Program money must shift in the direction of the program favored by Indians
- Priorities can be traded in favor of higher priorities.

The tone of these phrases indicates that since Indians have only a minimal say in the direction of educational programs, it would be easy to "trade" educational services for some other service which has a higher priority.

Another problem with the "priority analysis" budgeting process is that it is based upon three-year planning increments; a "priority" then becomes something the Tribe must live with until the next budget planning cycle. In order to increase funding of a desired program during the three year increment, a Tribe must proportionately decrease the funding level of another program. Theoretically, the total budget is never increased.

Criteria for Funding Educational Programs

The BIA policy for budget development is based upon the process referred to as "priority analysis" or band

analysis. The rationale for this system is formulated in an in-house letter from the Assistant Secretary of the Interior to all Area Directors which states:

> "We are committed to involving local Indian leadership in the program planning decisions of the Bureau of Indian Affairs. The use of the Band Analysis is one of the important ways by which we can gain this involvement. It would be hollow involvement, however, if we ignored the priorities which were established locally. We are, therefore, also committed to following the priorities established by the Band Analysis in making the Bureau's budget and distribution of resources. This policy of utilizing local priorities in developing the Bureau's budget has already been applied in making our FY 1975 budget."[18]

While this would seem commendable on the part of Interior, actually "priority" analysis negates Tribal input on the basis that budget "shifts" can take place without the consent of Tribes, thereby making it the BIAs budget-formulating process. If the plan is followed step by step, education is a high-priority item for most Tribes; however, the "priority" analysis budgeting process places education in a precarious position, since Tribes for the most part are not directly involved in education. A Tribal leader could conceivably slight education priorities in favor of some long-range program without even realizing it until after the action became final. In addition, band analysis becomes biased, and hence meaningless, for Johnson-O'Malley programs, since

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[18] U.S. Department of Interior transmittal to BIA Area Directors, from the Assisstant to the Secretary of Interior for Indian Affairs, November 19, 1973.

Tribes do not as a rule directly administer this program. Why should Tribes give money for public schools a higher priority than direct services to the Tribe?

The Director for the Office of Indian Education Programs of the BIA has issued an objective statement that, "By the end of Fiscal Year 1975, at least one-fourth (50) of the Bureau Schools will operate under the Management System chosen by those served by the schools."[19/]

While the objective is good, the BIA has outlined a process which is completely contradictory to the objective. The objective implies that those served by the school will choose the management system they desire; yet the BIA has begun the process of selecting schools that will contract, with or without Tribes' approval. Thus, with the parameters of choice controlled by BIA, it is conceiveable that many communities may not be ready to, nor want to, contract for educational services.

Additionally, the document implies that development of the educational budget will occur by the need for each objective. Yet the BIA budgeting process is still reliant upon "pricrity analysis" which requires three years lead time or projection. The Operational Planning System (OPS) proposed by the director does not outline the provisional changes that have to be made in the requirements for

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[19]U.S. Department of the Interior, Control of Education In BIA Schools- Presidential/Secretarial Objectives for Secretarial Planning System, Bureau of Indian Affairs, Washington, D.C., May 1974

allocations of band analysis with the budget requirements of OPS.

Band analysis presently includes the allocation process for Johnson-O'Malley Programs. This creates an untenable situation within BIA since Johnson-O'Malley funds are used primarily in public schools. Budgeting priorities, for JOM, theoretically are established by Tribes but are not administered by Tribes except in four states. Additionally, the present distribution formula for Johnson-O'Malley programs does not fit into the band analysis process since the new formula process relies on a per pupil expenditure basis.

Summary

This discussion of the funding process and the controversy over interpretation of Johnson-O'Malley regulations provide a concrete example of the BIA's inability to carry out its mandate as prescribed by law. This inability is rooted in an archaic management process which clearly indicates:

- Line authority either does not exist or top officials refuse to exercise their authority to establish clear lines of communication to the field and back to the Central Office, or
- Interpretation of management directives is confused or they are totally disregarded by field level authorities.

Clear and concise direction is needed from the Congress to remedy the BIA's failure to represent its constituency.

APPENDIX VI: PHYSICAL CHARACTERISTICS

The physical characteristics of the study sites should be considered in two distinct categories: urban and rural. The rationale for this approach is based upon several factors. The first to consider is the amount of tax exempt lands on Indian reservations as opposed to a significantly higher amount of taxable lands in and surrounding cities in the study. Another factor is the amount of leverage that urban school districts hold within state governments and their experience in dealing with state governments as opposed to the ability of smaller districts to develop a similar rapport. Additionally, the number of Indian children in urban schools does not have as significant an impact on construction needs of the schools involved as do the rural locations. Thus we have a comparative condition which establishes a greater basis of need in poorer (rural) districts that have a lower taxable evaluation and lower bonding capacity as opposed to the urban districts that generally have a higher support base.

Federally impacted areas have a general tendency to hinder a school district's ability to raise the revenues necessary to meet construction cost for increased enrollment needs. Thus Congress has enacted P.L. 81-815 and, although this legislation was not within the scope of this study, reference must be made to the legislation's effect on the physical facilities of our study sample.

Public Law 815 is generally referred to as the companion legislation to Public Law 874. Wherein P. L. 874 provides funds for operational costs to schools in federally impacted areas, Public Law 815 provides for construction of educational facilities. Determining eligibility of LEAs on or near reservations to receive payment for construction costs is founded on the basis (1) that an LEA is providing, or will provide, "free public instruction" to students who reside on Indian lands; (2) that the non-taxable status of Indian lands has created a "continuing impairment of its ability" [the LEA] to finance needed school facilities; (3) that the LEA will make a reasonable tax effort or will exhaust every available resource for assistance to meet the costs for facilities; and (4) that the LEA does not have sufficient funds available to provide minimum school facilities to provide "free public instruction." 1/

Public schools located on Indian reservations are required to submit applications to the United States Office of Education. These are reviewed and priority ratings are given each application. The National Indian Training and Research Center (NITRC) of Tempe, Arizona stated in a recent study that:

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[1] Act, September 15, 1950 76 Stat. 926, 20 U.S.C. 645 sec. 15, as amended 1974.

". . .as late as 1970, reports of the U.S.O.E. showed 53 project applications on file under Section 14 of P.L. 815 with an estimated entitlement of $38,469,719 and only $1,504,865 allocated to meet this need. Many other districts report that they have not filed P.L. 815 applications because of the apparent futility."[2]

There are several conditions which exist currently that drastically affect rural school systems. First, reservation school systems are placed on a competitive basis with all other federally impacted school systems. Military bases, Trust Territories, natural disaster areas, seemingly have been given a higher priority for P.L. 815 funds. Second, within the past several years Congress has held appropriations under this authorization to a significantly low funding level, thus creating a substantial backlog of applications. In the NITRC Report the grand total cost estimate of the 162 reporting school districts for all needed facilities was $237,962,723 in 1973. Third, there appears to be poor planning in relation to projected student growth which is noted in the NITRC Report. The Indian student growth in the 162 studied school districts in the NITRC Report is documented, for the last five years ending in 1973, at 16,811 students. Over the next five years beginning in 1973, 19,428 students are expected to enter these same 162 school districts. The

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[2]Francis McKinley, Public School Survey of Construction Aid Needs Related to the Education of Reservation Indian Children, National Indian Training and Research Center, Tempe, Arizona, 1972.

total national Indian student growth rate is estimated to be significantly higher.[3/]

It is apparent that information documenting the inequity and need for improvement and replacement for worn out, unsafe, inadequate and condemned facilities is in existence and available for use. If there is a total commitment to the equal education of Indian children, then information already available should provide the data needed for funding the construction of school facilities.

Site Observations

The only information to offer in reference to physical characteristics here is visual observation of the buildings, their age and condition. While many of the sites that have been visited appear to have adequate facilities, a number of our field contacts have stated that the facilities do not meet the enrollment needs and are often overcrowded. Additionally, the presence of modular or mobile units at reservation schools indicates the inability or unwillingness of school districts to raise the amounts needed for improvement of these facilities.

During the site visitations of this study we observed that many facilities in use for the education of Indian children are the last to receive funds for improvement

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[3] Ibid.

within the district. Schools in the outlying areas of the district are often old and in need of improvement and/or expansion but often are given low priorities in the district. These old schools lack space and are surrounded with mobile or modular units for expanded programs or because growth apparently has not been planned. This appears usual on or near reservations.

The urban districts in the study sample are not impacted heavily by an Indian enrollment as reservation districts may be. However, urban areas may not be so dissimilar to reservation situations. Where the most influence exists, the most attention is given. Where minorities and poverty areas exist, there is the least influence. Thus we find schools in poverty impacted areas also showing a need for new or improved facilities.

In 1969, the Senate Committee on Labor and Public Welfare submitted its report containing two major recommendations regarding school facilities. The first was, "That Section 14 of Public Law 81-815 be declared as deserving of priority funding". The reason was that Indian students continue to be transferred into public schools and because of inadequate funding for P.L. 815. It was noted that school districts were and are receiving little or no funds for construction of additional facilities which an increased Indian enrollment may necessitate. It was further noted

that it is essential that Section 14 funding be given the priority needed to provide adequate facilities for Indian students. Also, because of the lack of funding in recent years, there are areas where the question is not of adequate facilities, but of no facilities for Indian students at all. The second recommendation was, "that Public Law 81-815 be more fully funded." In this 1969 recommendation it was noted that P.L. 81-815 has been inadequately funded in recent years. This is still true today. The 1969 appropriation was only for 19 percent of authorization, and requests for 1967 still had not been funded by 1969. In further discussion of the recommendation it was felt to be "imperative" that more attention be given to funding this legislation, particularly for those sections under which disadvantaged students, such as Indians, are suffering with inadequate facilities.[4/] The NITRC Report also indicates that no substantial effort on the part of the federal government has been made to bring public school districts to the standards required for the increased Indian enrollments. Because of the low funding level of P.L. 815 and the funding priorities currently employed, we can safely state that, if a new direction is not taken in Congress and the U.S. Office of Education, Indian children will be forced to attend inadequate and

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[4]U.S. Congress, Senate, Indian Education: A National Tragedy -- A National Challenge, Special Subcommittee on Indian Education, Committee on Labor and Public Welfare, Rept. no. 91-501, 91st Congress First Session, (Washington, D.C.: Government Printing Office) 1969.

mediocre schools for a long time to come. At this point it is fitting to recall a passage from the Subcommittee Report which states: "It is difficult enough to teach children with special needs without having to face the added difficulty of inadequate facilities."[5/]

Conclusions and Recommendations

The Congress of the United States should adopt the recommendations relative to P.L. 81-815 of the Special Subcommittee Report on Indian Education as a policy for school construction. This document graphically illustrates the funding problems associated with the need for school facilities of reservation school districts.

The data provided in the NITRC Study should be used as the basis for determining funding priorities for P.L 81-815.

To accomplish this, Section 14 of P.L. 81-815 must be funded at a higher level to meet the current and future enrollment needs of Indian students.

The U.S. Office of Education must reevaluate the applications that are currently on file and emphasize the priorities of reservation school systems. High impact Indian areas should not have to compete nationally with other federally impacted areas.

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[5] Ibid.

Mobile and modular units as well as obsolete permanent facilities should be replaced with new permanent structures planned in accordance with the possible growth rate of the student body within a school. This will require planning by an LEA. If the technical capabilities do not exist within the LEA, resources should be provided by the U.S Office of Education to plan accordingly.

The U.S. Office of Education and the Bureau of Indian Affairs should be involved in planning for funding priorities for P.L. 81-815. This would permit the Bureau to identify communities with construction needs which can also be linked to community or Tribal identification of needs. School districts that receive P.L. 81-815 funds on the basis of Indian students in attendance should be compelled to expend such funds in the schools where the impact of Indian students is the greatest.

LIST OF ABBREVIATIONS

ACKCO	-	Artichoker, Clifford, Killer Co.
BIA	-	Bureau of Indian Affairs
BCQ*	-	Business Community Questionnaire
CFR	-	Code of Federal Regulations
CSSO	-	Chief State School Officer
CTC	-	Communications Technology Corporation
EDCQ*	-	Educational Content Questionnaire
ESEA	-	Elementary and Secondary Education Act, P. L. 89-10
HEW	-	Department of Health, Education and Welfare
HR	-	House of Representatives
IPAC	-	Indian Parent Advisory Committee
IRA	-	Indian Reorganization Act
JOM	-	Johnson-O'Malley Act (P. L. 73-167)
JOMRC	-	Johnson-O'Malley Review Committee
LEA	-	Local Education Agency
NACIE	-	National Advisory Council on Indian Education
NEFP	-	National Educational Finance Project
NITRC	-	National Indian Training and Research Center
OE	-	Office of Education
PAC	-	Parent Advisory Committee (or Council)
PACQ*	-	Parent Advisory Committee Questionnaire
P. L. 815	-	P. L. 81-815, Impact Aid Law (Construction)
P. L. 874	-	P. L. 81-874, Impact Aid Law (General Support)
QAS	-	Quality Assurance Specialist
RFP	-	Request for Proposal
SAFA	-	School Assistance in Federal Areas (refers to P. L. 874)

* See note on following page

SEA	-	State Education Agency
SEN	-	Senate
SIEA	-	State Indian Education Agency
SOS	-	State Operated Schools (Alaska)
SWCEL	-	Southwest Cooperative Educational Laboratory
Title I	-	Title I of the Elementary and Secondary Education Act, P. L. 89-10
Title IV	-	Indian Education Act, Title IV of P. L. 92-318
USC	-	United States Congress
USOE	-	United States Office of Education

*Note: Program Study scales are sometimes designated by acronyms. These acronyms are explained in the program section and, in more detail, in Appendix IV-A.

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